Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

OFFICE OF CONGRESSIONAL CONDUCT
UNITED STATES HOUSE OF REPRESENTATIVES

REPORT

Review No. 26-6164

The Board of the Office of Congressional Conduct (hereafter "the Board"), by a vote of no less than four members, on May 27, 2026, adopted the following report and ordered it to be transmitted to the Committee on Ethics of the United States House of Representatives (hereafter "the Committee").

SUBJECT: REPRESENTATIVE LANCE GOODEN

NATURE OF THE ALLEGED VIOLATION: Rep. Gooden may have engaged in improper reimbursement practices by seeking travel-related reimbursement that may not have been for official travel purposes. If Rep. Gooden improperly sought travel-related reimbursement for non-official travel purposes, then he may have violated House rules and federal law.

Rep. Gooden's campaign committee, Lance Gooden for Congress Committee, may have misreported or falsified campaign disbursements that may not have been attributable to bona fide campaign or political purposes. If Rep. Gooden misreported or falsified campaign disbursements, or if Rep. Gooden's campaign committee expended funds that were not attributable to bona fide campaign or political purposes, then Rep. Gooden may have violated House rules and federal law.

RECOMMENDATION: The Board recommends that the Committee further review the above allegation concerning Rep. Gooden because there is substantial reason to believe that Rep. Gooden improperly sought travel-related reimbursement for non-official travel purposes.

The Board recommends that the Committee further review the above allegation concerning Rep. Gooden because there is substantial reason to believe that Rep. Gooden may have knowingly misreported or falsified campaign disbursements or Rep. Gooden's campaign committee expended funds that were not attributable to bona fide campaign or political purposes.

VOTES IN THE AFFIRMATIVE: 5

VOTES IN THE NEGATIVE: 0

ABSTENTIONS: 0

MEMBER OF THE BOARD OR STAFF DESIGNATED TO PRESENT THIS REPORT TO THE COMMITTEE: Omar S. Ashmawy, Staff Director & Chief Counsel.

FINDINGS OF FACT AND CITATIONS TO LAW

TABLE OF CONTENTS

I. INTRODUCTION 3

A. Summary of Allegations 3

B. Jurisdictional Statement 3

C. Procedural History 4

D. Summary of Investigative Activity 4

II. REP. GOODEN MAY HAVE ENGAGED IN IMPROPER REIMBURSEMENT PRACTICES BY SEEKING TRAVEL-RELATED REIMBURSEMENT THAT MAY HAVE NOT BEEN FOR OFFICIAL TRAVEL PURPOSES. 6

A. Applicable Law, Rules, and Standards of Conduct 6

B. Rep. Gooden May Have Improperly Sought Travel-Related Reimbursements for Unofficial Purposes. 8

i. Rep. Gooden's Lodging Expenses 9

ii. Rep. Gooden's Airfare Expenses 11

iii. Rep. Gooden's Car Rental/Rideshare Expenses 17

III. REP. GOODEN'S CAMPAIGN COMMITTEE, LANCE GOODEN FOR CONGRESS COMMITTEE, MAY HAVE KNOWINGLY MISREPORTED OR FALSIFIED CAMPAIGN DISBURSEMENTS THAT MAY NOT HAVE BEEN ATTRIBUTABLE TO BONA FIDE CAMPAIGN OR POLITICAL PURPOSES..... 20

A. Applicable Law, Rules, and Standards of Conduct 20

B. Rep. Gooden's Campaign Committee, Lance Gooden for Congress Committee, May Have Misreported or Falsified Campaign Disbursements that May Not Have Been Attributable to Bona Fide Campaign or Political Purposes. 23

i. Credit Card Reimbursement Inaccuracies 23

ii. Travel Reimbursement Inaccuracies 27

iii. Potential Personal Use of Campaign Funds 32

IV. CONCLUSION 34

V. INFORMATION THE OCC WAS UNABLE TO OBTAIN AND RECOMMENDATION FOR THE ISSUANCE OF SUBPOENAS 35

OFFICE OF CONGRESSIONAL CONDUCT
UNITED STATES HOUSE OF REPRESENTATIVES

FINDINGS OF FACT AND CITATIONS TO LAW

Review No. 26-6164

On May 27, 2026, the Board of the Office of Congressional Conduct (hereafter "the Board") adopted the following findings of fact and accompanying citations to law, regulations, rules and standards of conduct (*in italics*).

I. INTRODUCTION

A. Summary of Allegations

1. Rep. Gooden may have engaged in improper reimbursement practices by seeking travel-related reimbursement that may not have been for official travel purposes. If Rep. Gooden improperly sought travel-related reimbursement for non-official travel purposes, then he may have violated House rules and federal law.

2. The Board recommends that the Committee on Ethics of the United States House of Representatives ("Committee") further review the above allegation concerning Rep. Gooden because there is substantial reason to believe that he may have improperly sought travel-related reimbursement for non-official travel purposes.

3. Rep. Gooden's campaign committee, Lance Gooden for Congress Committee, may have misreported or falsified campaign disbursements that may not have been attributable to bona fide campaign or political purposes. If Rep. Gooden misreported or falsified campaign disbursements, or if Rep. Gooden's campaign committee expended funds that were not attributable to bona fide campaign or political purposes, then Rep. Gooden may have violated House rules and federal law.

4. The Board recommends that the Committee further review the above allegation concerning Rep. Gooden because there is substantial reason to believe that Rep. Gooden may have misreported or falsified campaign disbursements or Rep. Gooden's campaign committee expended funds that were not attributable to bona fide campaign or political purposes.

B. Jurisdictional Statement

5. The allegations that were the subject of this review concern Rep. Gooden, a Member of the United States House of Representatives from the 5th Congressional District of Texas. The Resolution the United States House of Representatives adopted creating the Office of Congressional Conduct ("OCC") directs that, "[n]o review shall be undertaken … by the [B]oard of any alleged violation that occurred before the date of adoption of this resolution."[1] The House adopted this Resolution on March 11, 2008.

[1] H. Res. 895 of the 110th Congress § 1(e) (2008) (as amended) (hereafter the "Resolution").

C. Procedural History

6. The OCC received a written request for a preliminary review in this matter signed by at least two members of the Board on January 28, 2026. The preliminary review commenced on January 29, 2026.[2]

7. On January 29, 2026, the OCC notified Rep. Gooden of the initiation of the preliminary review, provided him with a statement of the nature of the review, notified him of his right to be represented by counsel in this matter, and notified him that invoking his right to counsel would not be held negatively against him.[3]

8. At least three members of the Board voted to initiate a second-phase review in this matter on February 25, 2026. The second-phase review commenced on February 28, 2026.[4] The second-phase review was scheduled to end on April 13, 2026.

9. On February 27, 2026, the OCC notified Rep. Gooden of the initiation of the second-phase review in this matter, and again notified him of his right to be represented by counsel in this matter, and that invoking that right would not be held negatively against him.[5]

10. The Board voted to extend the second-phase review by an additional period of fourteen days on March 25, 2026. The additional period ended on April 27, 2026.

11. The Board voted to refer the matter to the Committee for further review and adopted these findings on May 27, 2026.

12. The report and its findings in this matter were transmitted to the Committee on June 10, 2026.

D. Summary of Investigative Activity

13. The OCC requested documentary and, in some cases, testimonial information from the following sources:

    (1) Rep. Gooden;
    (2) Matthew Esguerra;
    (3) Jackson R. Willis;
    (4) Edward McCain;
    (5) Susan Shawn Tidwell;
    (6) Jennifer Alden;

[2] A preliminary review is "requested" in writing by members of the Board of the OCC. The request for a preliminary review is received by the OCC on a date certain. According to the Resolution, the timeframe for conducting a preliminary review is 30 days from the date of receipt of the Board's request.
[3] Letter from Omar S. Ashmawy, Chief Counsel and Staff Dir., Office of Cong. Conduct, to Rep. Gooden (Jan. 29, 2026).
[4] According to the Resolution, the Board must vote (as opposed to make a written authorization) on whether to conduct a second-phase review in a matter before the expiration of the 30-day preliminary review. If the Board votes for a second phase, the second phase commences the day after the preliminary review ends.
[5] Letter from Omar S. Ashmawy, Chief Counsel and Staff Dir., Office of Cong. Conduct, to Rep. Gooden (Feb. 27, 2026).

(7) Madison Malone;
(8) Micah Bock;
(9) Robert Phillips III;
(10) Peyton Smith;
(11) Commercial Airline 1;
(12) JP Morgan Chase; and
(13) The Chief Administrative Officer of the House of Representatives ("the CAO").

14. The following individuals and entities refused to cooperate with the OCC's review:

(1) Rep. Gooden;
(2) Matthew Esguerra;
(3) Jackson R. Willis;
(4) Edward McCain;
(5) Susan Shawn Tidwell;
(6) Jennifer Alden;
(7) Madison Malone;
(8) Micah Bock;
(9) Robert Phillips III; and
(10) JP Morgan Chase[6].

15. The following individuals and entities were represented by the same counsel and refused to resolve a conflict of interest arising from multiple representation in spite of receiving notice pursuant to OCC Rule 14(B).[7] Their multiple representation may have prejudiced the review:

(1) Rep. Gooden;
(2) Matthew Esguerra; and
(3) Jackson R. Willis.

[6] JP Morgan Chase, through counsel, engaged in a series of meetings with the OCC in attempts to cooperate with the OCC's review. Citing internal and privacy policies, JP Morgan Chase (through counsel) declined to provide requested documents though expressed an affirmative willingness to comply upon receipt of a formal subpoena from the House Ethics Committee.

[7] In a March 25, 2026 letter to the OCC, Rep. Gooden's counsel referenced purported discussions between the OCC and other third-party witnesses identified throughout this review. This suggests counsel and/or Rep. Gooden, Mr. Esguerra, or Mr. Willis have been in contact with third-party witnesses the OCC had contacted in connection with this review. Notably, while those individuals initially indicated a willingness to sit for interviews with the OCC, they subsequently ceased all communications with OCC staff. The sudden cessation of communications from these individuals impeded the OCC's ability to thoroughly assess issues raised in this review. The OCC notes that pursuant to 18 U.S.C. § 1512(b)(1)-(3), Members of Congress may not "knowingly use[] intimidation, threaten[], or corruptly persuade[] another person, or attempt[] to do so, or engage[] in misleading conduct toward another person, with intent to" obstruct or impede an official proceeding.

II. REP. GOODEN MAY HAVE ENGAGED IN IMPROPER REIMBURSEMENT PRACTICES BY SEEKING TRAVEL-RELATED REIMBURSEMENT THAT MAY HAVE NOT BEEN FOR OFFICIAL TRAVEL PURPOSES.

A. Applicable Law, Rules, and Standards of Conduct

16. House Rules

House Rule 23, clause 1 provides that "[a] Member, Delegate, Resident Commissioner, officer, or employee of the House shall behave at all times in a manner that shall reflect creditably on the House."

House Rule 23, clause 2 provides that "[a] Member, Delegate, Resident Commissioner, officer, or employee of the House shall adhere to the spirit and the letter of the Rules of the House and to the rules of duly constituted committees thereof."

17. Federal Law

Title 18 U.S.C. § 1001 (a)(2), (c)(1) prohibits Members from submitting "a claim for payment" to the U.S. House of Representatives that contains a false statement concerning the purpose for which reimbursement is sought. If such a claim is made, then the Member has "knowingly and willfully" made a "materially false, fictitious or fraudulent statement or representation" to the legislative branch in violation of federal law.

Title 18 U.S.C. § 641 provides in part that "[w]homever embezzles, steals, purloins, or knowingly converts to his use or the use of another, … any … thing of value of the United States or of any department or agency thereof…" has committed a felony punishable by fines or imprisonment of up to ten years.

Title 31 U.S.C. § 1301 states that "[a]ppropriations shall be applied only to the objects for which the appropriations were made except as otherwise provided by law."

18. House Ethics Manual

According to the House Ethics Manual,

> *the MRA may only be used for official and representational expenses. The MRA may not be used to pay for any expenses related to activities or events that are primarily social in nature, personal expenses, campaign or political expenses, or House committee expenses. Members may be personally liable for misspent funds or expenditures exceeding the MRA.*
>
> *The rules governing the MRA include the following restrictions:*
>
> - *The MRA may be used only for official expenses;*

- *The MRA may **not** be converted to personal or campaign use or applied toward any unofficial activity….*[8]

Moreover, the House Ethics Manual notes that

> *Member and staff travel, including to one's district, may be paid with official funds only if the **primary purpose** of the trip is the conduct of **official business**. As a general matter, a Member or staff person, while on official travel, may engage in incidental campaign or political activity, provided that no additional travel expenses are incurred as a result. However, when the primary purpose of a trip is in fact the conduct of campaign or political activity, then the travel expenses must be paid with campaign funds and cannot be paid with official funds.*
>
> *The Members' Handbook and the Committees' Handbook issued by the Committee on House Administration include provisions on campaign activity in the course of travel paid for with House funds. Thus when a Member or staff person wishes to engage in any such activity in the course of an official trip, he or she should first review the section of the appropriate Handbook on travel and consult with the Committee on House Administration staff as necessary.*[9]

Additionally, "[t]o receive reimbursement [. . .] a House traveler must follow the usually traveled routes. A traveler who chooses an indirect route or stops along the way for nonofficial purposes will be personally responsible for any added expense."[10]

The House Ethics Manual also notes that

> *Federal law provides that official funds may be used only for the purposes for which they are appropriated. When funds are used other than for their intended purposes, the misused funds may be recovered by the government for repayment to the United States Treasury. The use of the MRA for other than official purposes, including double billing and claims for nonexistent expenses, could subject a Member, officer, or employee to civil penalties under the False Claims Act.*[11]

19. Members' Congressional Handbook

The Members' Congressional Handbook specifies that "[o]rdinary and necessary expenses incurred by the Member or the Member's employees within the United States, its territories, and possessions in support of the conduct of the Member's official and representational duties to the

[8] House Committee on Ethics, House Ethics Manual (2022 Print) (hereinafter "House Ethics Manual"), at 331 (internal citations omitted) .
[9] *Id.* at 141 (internal citations omitted).
[10] *Id.* at 337.
[11] *Id.* at 339 (internal citations omitted).

district from which elected are reimbursable in accordance with the regulations contained in this Members' Congressional Handbook."[12]

Accordingly, "'[o]rdinary and necessary' means ***reasonable expenditures in support of official and representational duties to the district from which he or she is elected that are consistent with all applicable federal laws, Rules of the House of Representatives and regulations of the Committee on House Administration****."*[13]

Additionally, "'[u]nless specifically authorized by an applicable provision of federal law, House Rules, or Committee Regulations, no Member, relative of the Member, or anyone with whom the Member has a professional or legal relationship may directly benefit from the expenditure of the MRA."[14]

Although "[t]he Committee encourages the official use of travel promotional awards wherever practicable[,]" "Members and employees cannot be reimbursed for utilizing promotional awards for official travel as no expense was incurred."[15]

B. Rep. Gooden May Have Improperly Sought Travel-Related Reimbursements for Unofficial Purposes.

20. On December 15, 2025, public reporting alleged Rep. Lance Gooden received more travel reimbursements than any other member of the House, specifically $140,000 (at the time of the article) just in 2025.[16] In this review, the OCC examined whether Rep. Gooden, representing Texas's 5th Congressional District, complied with House rules and federal law in connection with his travel expenditures. Applicable regulations prohibit Members of Congress from using the Members' Representational Allowance ("MRA") for personal, campaign, or unofficial expenses.[17] The OCC identified a pattern of extravagant expenditures by Rep. Gooden that appear inconsistent with his official duties.

21. Rep. Gooden and several members of his official and campaign staff declined to cooperate with the OCC's review, which materially impeded the OCC's ability to reconcile the pattern of high-cost expenditures and inconsistent reporting.

[12] *See* House Committee on House Administration, *Members' Congressional Handbook* (adopted April 30, 2024) at 4 (hereinafter "Members' Handbook"), available at https://cha.house.gov/_cache/files/4/d/4d349c6e-5ab8-4038-9ad1-58caaf29c333/E330DF2454AB021015F559082F61571A244284BCCC8056F2019EC5684FC61EA2.final-member-handbook-9.12.25-34-.pdf.
[13] *Id*. (emphasis added).
[14] *Id.* at 6.
[15] *Id.* at 45.
[16] *See* Caleb Mynatt, "*Rep. Gooden tallies massive official travel reimbursements*," Legistorm (Dec. 15, 2025), https://www.legistorm.com/pro_news/4359/rep-gooden-tallies-massive-official-travel-reimbursements.html?utm_content=361870984&utm_medium=social&utm_source=facebook&hss_channel=fbp-281238315541.
[17] *See supra,* Part II.A.

i. Rep. Gooden's Lodging Expenses

22. In 2025, Rep. Gooden received $72,082.29 in lodging reimbursements.[18] Reimbursement records reviewed by the OCC indicate a pattern of brief (*e.g.*, one- to three-day) stays at luxury hotels costing approximately between $700 to over $4,000 per stay. *See Table 1 below.*

Name	Hotel Name	Dates	Amount
Rep. Gooden	The Chatwal	3/8/25 – 3/10/25	$2537.22[19]
Rep. Gooden	Thompson Hotel (Austin)	3/28/25 – 3/30/25	$2210.61[20]
Rep. Gooden	The Chatwal	4/3/25 – 4/4/25	$1346.64[21]
Ed McCain	Park Hyatt DC	1/1/25 – 1/4/25	$1149.20[22]
Ed McCain	Park Hyatt DC	3/31/25 – 4/3/25	$4250.38[23]
Ed McCain	Park Hyatt DC	5/6/25 – 5/8/25	$2054.05[24]
Matthew Esguerra	Ritz Carlton (Dallas)	4/13/25 – 4/16/25	$1392.66[25]
Jackson R. Willis	Park Hyatt DC	1/1/25 – 1/4/25	$2808.34[26]
Jackson R. Willis	Salamander DC	12/10/25 – 12/12/25	$1930.57[27]

[18] Statement of Disbursements of the House (January 1, 2025, to March 31, 2025); Statement of Disbursements of the House (April 1, 2025, to June 30, 2025); Statement of Disbursements of the House (July 1, 2025, to September 30, 2025); Statement of Disbursements of the House (October 1, 2025, to Dec. 31, 2025).
[19] U.S. House of Representatives Expense Reimbursement Form and accompanying receipts and Voucher Cover Sheet, submitted March 12, 2025 (Exhibit 1 - 2 at 26-6164_0013).
[20] U.S. House of Representatives Expense Reimbursement Form and accompanying receipts and Voucher Cover Sheet, submitted March 31, 2025 (Exhibit 3 - 4 at 26-6164_0024).
[21] U.S. House of Representatives Expense Reimbursement Form and accompanying receipts and Voucher Cover Sheet, submitted April 8, 2025 (Exhibit 5 - 6 at 26-6164_0041).
[22] U.S. House of Representatives Expense Reimbursement Form and accompanying receipts and Voucher Cover Sheet, submitted January 9, 2025 (Exhibit 7 - 8 at 26-6164_0051).
[23] U.S. House of Representatives Expense Reimbursement Form and accompanying receipts and Voucher Cover Sheet, submitted April 8, 2025 (Exhibit 5 - 6 at 26-6164_0037).
[24] U.S. House of Representatives Expense Reimbursement Form and accompanying receipts and Voucher Cover Sheet, submitted May 22, 2025 (Exhibit 9 – 10 at 26-6164_0074).
[25] U.S. House of Representatives Expense Reimbursement Form and accompanying receipts and Voucher Cover Sheet, submitted April 22, 2025 (Exhibit 11 - 12 at 26-6164_0089).
[26] U.S. House of Representatives Expense Reimbursement Form and accompanying receipts and Voucher Cover Sheet, submitted January 9, 2025 (Exhibit 7 - 8 at 26-6164_0052).
[27] U.S. House of Representatives Expense Reimbursement Form and accompanying receipts and Voucher Cover Sheet, submitted December 12, 2025 (Exhibit 13 - 14 at 26-6164_0107).

Jennifer Alden	Park Hyatt DC	1/17/25 – 1/20/25	$4018.44[28]
Jennifer Alden	W Hotels (Austin)	5/21/25 – 5/26/25	$2289.12[29]
Jennifer Alden	Conrad	6/4/25 – 6/5/25	$702.05[30]

Table 1: Sample of lodging expenses based on official House records.

23. Although high-end accommodations are not strictly prohibited, the Members' Congressional Handbook makes clear that lodging expenditures reimbursed under the MRA must be "reasonable . . . in support of official and representational duties to the district from which [the Member] is elected . . . ."[31]

24. That pattern of high-cost lodging appears inconsistent with the Congressman's own personal standard for travel expenditures. Internal communications obtained from a third-party vendor reveal that while on personal travel in Brazil, Rep. Gooden complained about the cost of a hotel room priced at $800 per night: "Our New Year's Eve was spent searching for a car and a hotel at midnight on NYE in a dangerous city. My 5 and 6 year old children were scared and tired, along with my wife. **I found a hotel across town that was expensive ($800 for one night but we 4 shared it).**"[32] That characterization stands in stark contrast to official reimbursements he authorized for stays at properties such as the Park Hyatt DC and The Chatwal, where nightly rates frequently exceeded $1,000 and, in some instances, reached over $2,000 per night. This evidence underscores the concern that the Congressman failed to exercise the same care with official funds that a reasonable person would exercise if traveling on personal business.

25. The frequency of brief stays at luxury hotels, often amounting to thousands of dollars per visit, raises legitimate questions as to whether such expenditures were reasonable under applicable House rules and standards.

26. However, due to Rep. Gooden and his office refusing to cooperate with the OCC's review, the OCC was unable to determine if these luxury stays were necessary or commensurate with his official responsibilities.

[28] U.S. House of Representatives Expense Reimbursement Form and accompanying receipts, submitted January 22, 2025 (Exhibit 15 at 26-6164_0127).
[29] U.S. House of Representatives Expense Reimbursement Form and accompanying receipts, Summary & Signature Page, and Voucher Cover Sheet, submitted May 29, 2025 (Exhibit 16 - 18 at 26-6164_138).
[30] U.S. House of Representatives Expense Reimbursement Form and accompanying receipts and Voucher Cover Sheet, submitted June 19, 2025 (Exhibit 19 - 20 at 26-6164_0159).
[31] Members' Handbook at 4.
[32] *See* January 10, 2025, Email between Commercial Airline 1 and Rep. Gooden (Exhibit 21 at 26-6164_0174) (emphasis added).

ii. Rep. Gooden's Airfare Expenses

27. Rep. Gooden received $58,252.24 in airfare reimbursements in 2025.[33]

28. A review of expense reimbursement forms, voucher forms, and accompanying receipts shows that Rep. Gooden and his staff almost exclusively utilized business or first-class travel (see Table 2 below).

Name	Flight Route	Dates	Amount
Rep. Gooden	DFW ↔ IAD	2/11/25 – 2/13/25	$1666.66[34]
Rep. Gooden	IAD → DFW	3/6/25	$1344.48[35]
Rep. Gooden	EWR → DCA	3/8/25	$2836.97[36]
Rep. Gooden	DCA → SFO	3/11/25	$1135.08[37]
Rep. Gooden	DFW → DCA → IAH → AUS	3/23/25 – 3/26/25	$2102.17[38]

Table 2: Sample of airfare expenses based on official House records.

29. House rules require MRA expenditures to be "ordinary and necessary."[39] For example, the House Ethics Manual contains strict guidance governing "acceptable travel expenses," including certain parameters for when business or first-class travel may be authorized:

> 1) the cost of the business or first class ticket is not more expensive than the economy class ticket,
>
> 2) the upgraded travel is necessary to accommodate a disability or special need,
>
> 3) genuine security circumstances require the travel,
>
> 4) scheduled travel time including layovers exceeds 14 hours,
>
> 5) a domestic flight departs before midnight and lands after 5am the following day, and

[33] Statement of Disbursements of the House (January 1, 2025, to March 31, 2025); Statement of Disbursements of the House (April 1, 2025, to June 30, 2025); Statement of Disbursements of the House (July 1, 2025, to September 30, 2025); Statement of Disbursements of the House (October 1, 2025, to December 31, 2025).
[34] U.S. House of Representatives Expense Reimbursement Form and accompanying receipts and Voucher Cover Sheet, submitted February 14, 2025 (Exhibit 22 - 23 at 26-6164_0197 to 26-6164_0199).
[35] U.S. House of Representatives Expense Reimbursement Form and accompanying receipts and Voucher Cover Sheet, submitted March 12, 2025 (Exhibit 1 - 2 at 26-6164_0004 to 26-6164_0006).
[36] *Id.* at 26-6164_0007 to 26-6164_0009.
[37] *Id.* at 26-6164_0010 to 26-6164_0012.
[38] U.S. House of Representatives Expense Reimbursement Form and accompanying receipts and Voucher Cover Sheet, submitted March 28, 2025 (Exhibit 24 - 25 at 26-6164_0205 to 26-6164_0206).
[39] House Ethics Manual at 331.

6) exceptional circumstances exist.

The Manual further notes that "[e]xceptional circumstances do not include the unavailability of business or economy class seats or that first class or charter travel is more convenient for the House traveler's schedule."[40]

While these provisions apply to privately sponsored, officially connected travel, they underscore a broader, reasonable personal standard that should guide flight selections for official purposes. In the absence of documented medical needs, security requirements, or the unavailability of coach seats, an almost exclusive preference for flying business or first class could indicate unnecessary expenditures. Because Rep. Gooden refused to cooperate, the OCC lacks evidence that could explain whether the luxury accommodation and services were ordinary and necessary.

a. Duplicate Reimbursements and Third-Party Benefits

30. Separately, the OCC's review of relevant documents identified two significant irregularities. First, Rep. Gooden's airfare reimbursements showed that on at least one occasion Rep. Gooden received duplicate reimbursement for a flight on which his son accompanied him. An expense reimbursement form submitted to the CAO on June 19, 2025, shows that Rep. Gooden's son accompanied him on a June 13, 2025 flight from Washington Dulles Airport to Dallas Fort Worth Airport.[41] The total cost for both flights was $756.96; however, Rep. Gooden requested reimbursement only for his individual share of $378.48.[42] After initially requesting reimbursement for only his portion of the ticket, a subsequent request was submitted days later on June 26, 2025, for the same amount, which seemingly covered his son's travel costs.[43]

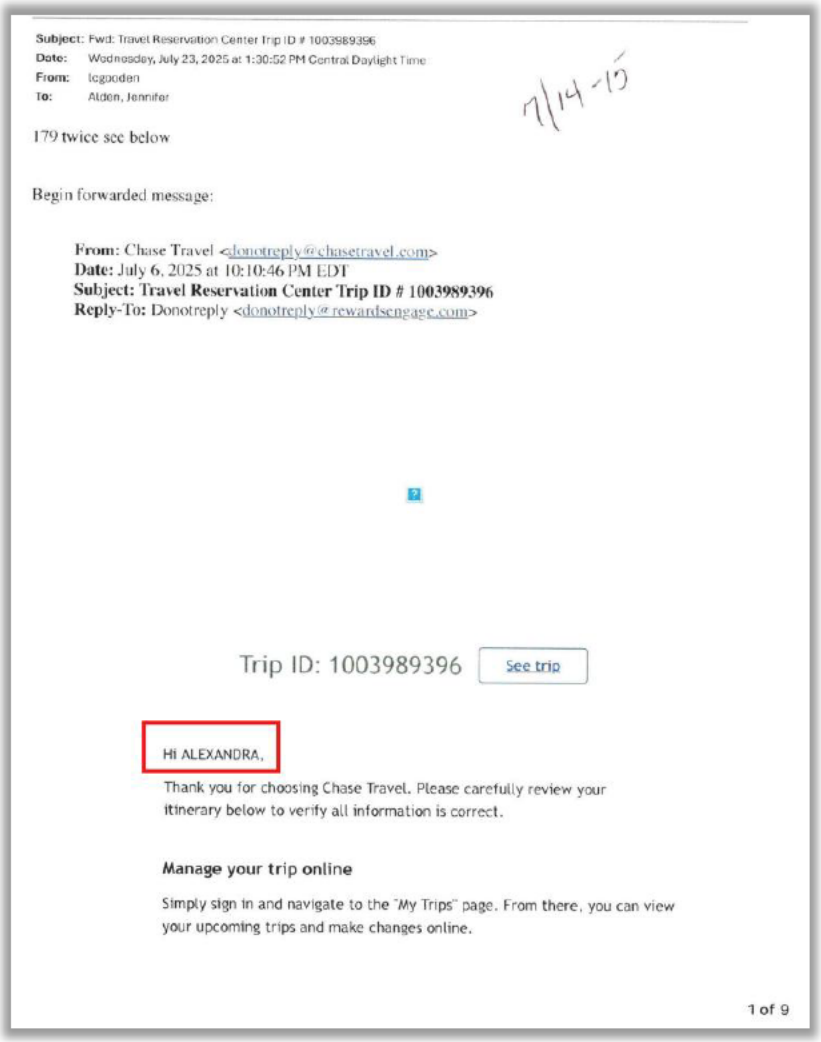
31. At a minimum, the available records suggest the duplicate flight reimbursements may have resulted from an inadvertent error, indicating inadequate internal controls over the review and approval of expenses. Even assuming an inadvertent mistake, such deficiencies raise concerns regarding the reliability of existing oversight mechanisms in Rep. Gooden's office.

32. Next, the OCC found that on at least two occasions, official travel for staff appears to have been booked through the Chase Travel portal of Rep. Gooden's wife. Using a relative's account allows for the accumulation of private rewards and benefits from official funds, which is prohibited by House rules.

33. Specifically, records submitted to the CAO show that Madison Malone, Rep. Gooden's former legislative correspondent, booked a July 14-15, 2025 flight between Washington, D.C. and Boston, Massachusetts. A confirmation email from "Chase Travel" verifying the

[40] *See id.* at 101-102, note 24.
[41] U.S. House of Representatives Expense Reimbursement Form and accompanying receipts, submitted June 19, 2025 (Exhibit 19 at 26-6164_160).
[42] *Id.* at 26-6164_0160 to 26-6164_0161 and 26-6164_0154.
[43] U.S. House of Representatives Expense Reimbursement Form and accompanying receipts, submitted June 26, 2025 (Exhibit 26 at 26-6164_0211 and 26-6164_0213 to 26-6164_0214).

flight was addressed to an "Alexandra."[44] Rep. Gooden's wife's name is Alexandra Gooden. Other documents show that Rep. Gooden maintains his own Chase Travel account and has booked flights through his own portal, suggesting he and his wife keep separate accounts.[45] Ms. Gooden's Chase Travel portal was also used to book the Hotel Swexan for Ed McCain, Rep. Gooden's Operations Director.[46] The lodging was for two nights between July 18–20, 2025, for $1,536.35.[47] *See Figures 1.1–2.2 below.*



Subject: Fwd: Travel Reservation Center Trip ID # 1003989396
Date: Wednesday, July 23, 2025 at 1:30:52 PM Central Daylight Time
From: lcgooden
To: Alden, Jennifer

7/14 - 15

179 twice see below

Begin forwarded message:

From: Chase Travel <donotreply@chasetravel.com>
Date: July 6, 2025 at 10:10:46 PM EDT
Subject: Travel Reservation Center Trip ID # 1003989396
Reply-To: Donotreply <donotreply@rewardsengage.com>

Trip ID: 1003989396 See trip

Hi ALEXANDRA,

Thank you for choosing Chase Travel. Please carefully review your itinerary below to verify all information is correct.

Manage your trip online

Simply sign in and navigate to the "My Trips" page. From there, you can view your upcoming trips and make changes online.

1 of 9

Figure 1.1: Excerpt of Exhibit 27, trip confirmation from Chase Travel addressed to "ALEXANDRA."

[44] *See* U.S. House of Representatives Expense Reimbursement Form and accompanying receipts, submitted July 23, 2025 (Exhibit 27 at 26-6164_232).
[45] *See e.g.*, U.S. House of Representatives Expense Reimbursement Form and accompanying receipts, submitted April 8, 2025 (Exhibit 5 at 26-6164_0039).
[46] *See* U.S. House of Representatives Expense Reimbursement Form and accompanying receipts and Voucher Cover Sheet, submitted July 23, 2025 (Exhibit 27 – 28 at 26-6164_0243 to 26-6164_0244).
[47] *Id.* at 26-6164_0244.

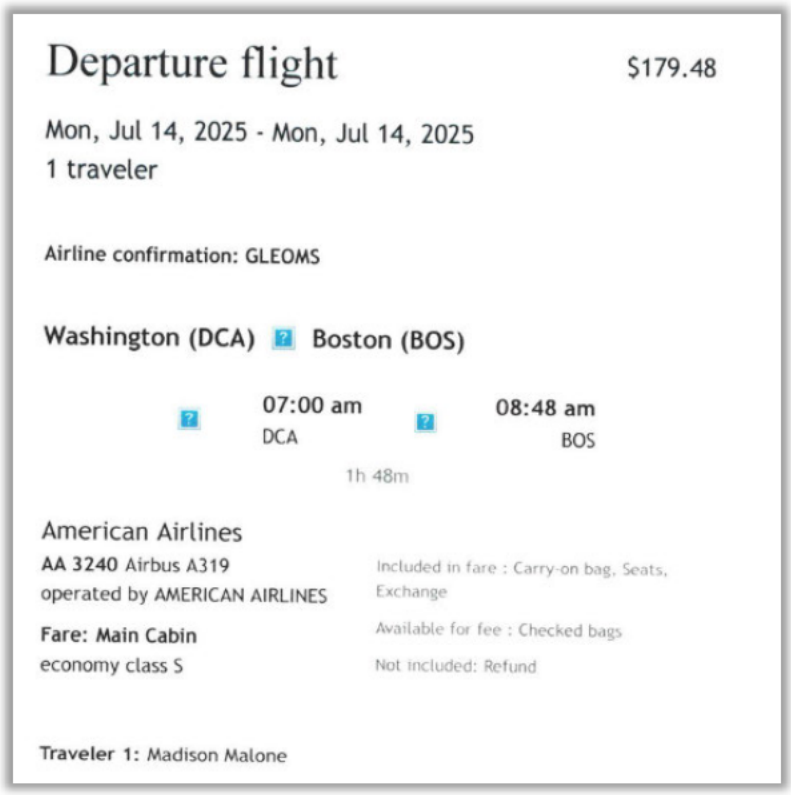
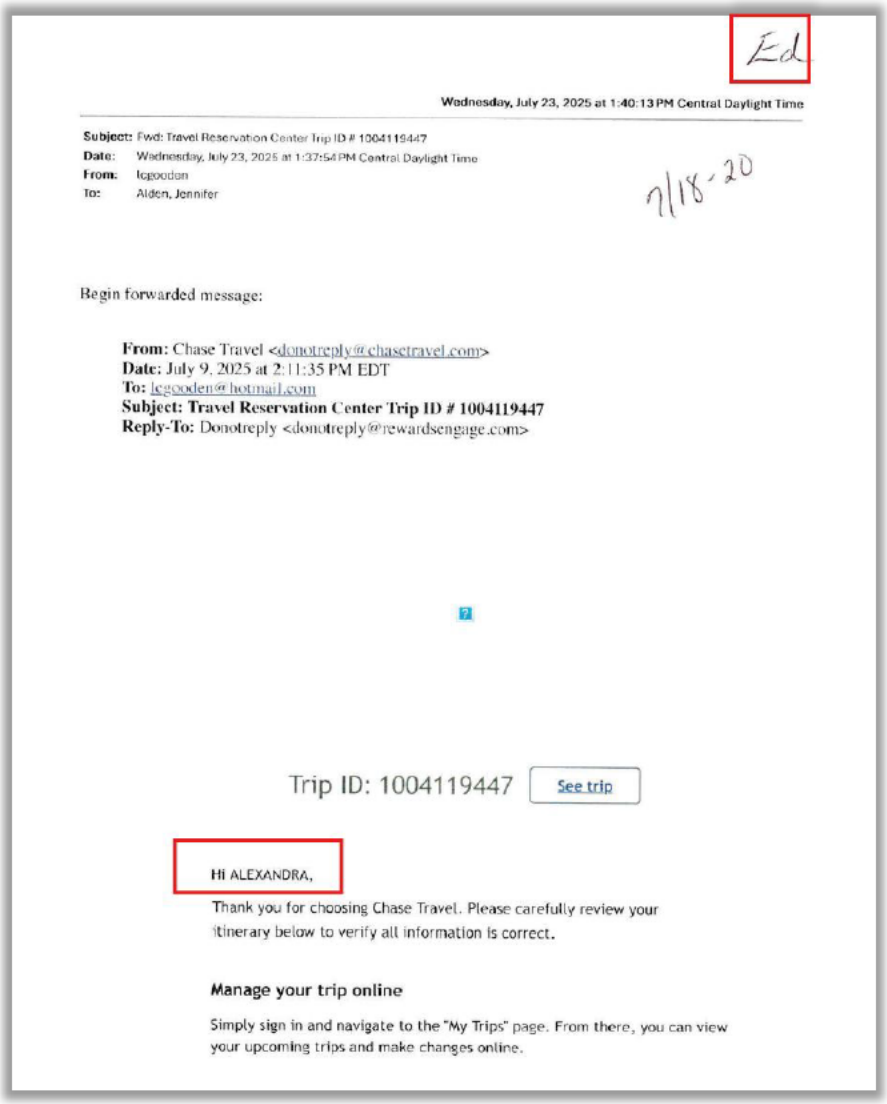


Figure 1.2: Excerpt of Exhibit 27, flight details for trip associated with Figure 1.1, Chase Travel confirmation email addressed to "ALEXANDRA.".



Ed

Wednesday, July 23, 2025 at 1:40:13 PM Central Daylight Time

Subject: Fwd: Travel Reservation Center Trip ID # 1004119447
Date: Wednesday, July 23, 2025 at 1:37:54 PM Central Daylight Time
From: lcgooden
To: Alden, Jennifer

7/18-20

Begin forwarded message:

From: Chase Travel <donotreply@chasetravel.com>
Date: July 9, 2025 at 2:11:35 PM EDT
To: lcgooden@hotmail.com
Subject: Travel Reservation Center Trip ID # 1004119447
Reply-To: Donotreply <donotreply@rewardsengage.com>

Trip ID: 1004119447 See trip

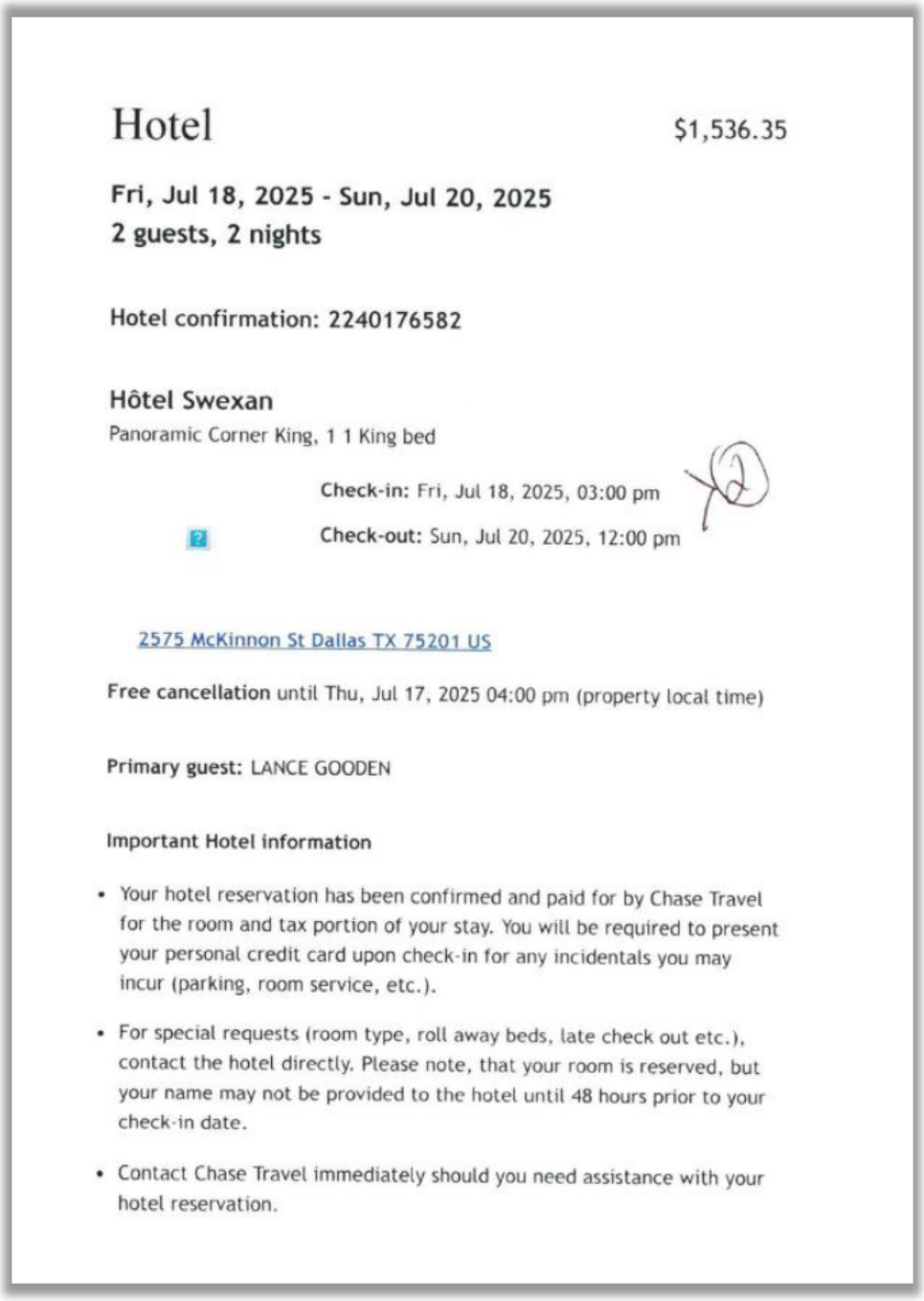
Hi ALEXANDRA,

Thank you for choosing Chase Travel. Please carefully review your itinerary below to verify all information is correct.

Manage your trip online

Simply sign in and navigate to the "My Trips" page. From there, you can view your upcoming trips and make changes online.

Figure 2.1: Excerpt of Exhibit 27, Chase Travel confirmation email addressed to "ALEXANDRA" for July 18 – 20 stay at Hotel Swexan.



Hotel $1,536.35

Fri, Jul 18, 2025 - Sun, Jul 20, 2025
2 guests, 2 nights

Hotel confirmation: 2240176582

Hôtel Swexan
Panoramic Corner King, 1 1 King bed

Check-in: Fri, Jul 18, 2025, 03:00 pm
Check-out: Sun, Jul 20, 2025, 12:00 pm

2575 McKinnon St Dallas TX 75201 US

Free cancellation until Thu, Jul 17, 2025 04:00 pm (property local time)

Primary guest: LANCE GOODEN

Important Hotel information

- Your hotel reservation has been confirmed and paid for by Chase Travel for the room and tax portion of your stay. You will be required to present your personal credit card upon check-in for any incidentals you may incur (parking, room service, etc.).
- For special requests (room type, roll away beds, late check out etc.), contact the hotel directly. Please note, that your room is reserved, but your name may not be provided to the hotel until 48 hours prior to your check-in date.
- Contact Chase Travel immediately should you need assistance with your hotel reservation.

Figure 2.2: Travel confirmation email addressed to "Alexandra" for Hotel Swexan.[48]

[48] Note that while the screenshot shows the "primary guest" at Hotel Swexan was "Lance Gooden," the description for this lodging included on the U.S. House of Representatives Expense Reimbursement Form was: "Hotel Swexan, via Chase Travel, 2 nights, for staffer Ed McCain, official meetings." *See* U.S. House of Representatives Expense Reimbursement Form and accompanying receipts, submitted July 23, 2025 (Exhibit 27 at 26-6164_0224).

34. House rules explicitly prohibit Members of Congress and their relatives from directly benefiting from the expenditure of the MRA.[49] Arranging official travel through Rep. Gooden's wife's account, which allows the accumulation of rewards points or other credit card benefits on expenses later reimbursed under the MRA, effectively converts official funds into Rep. Gooden and his wife's personal financial benefit. Absent justification, such conduct appears inconsistent with House rules prohibiting private gain from the use of official funds.

35. The Members' Congressional Handbook also states that Members and staff "cannot be reimbursed for utilizing promotional awards for official travel as no expense was incurred."[50] According to records submitted to the CAO, Rep. Gooden was directly reimbursed $735.68 for a September 5, 2025 flight between Dallas Fort Worth and Houston, Texas. The flight receipt, however, shows that Rep. Gooden applied Commercial Airline 1's "future flight credit."[51] This "future flight credit" is issued when customers cancel or change their flights to a less expensive one.[52] Without cooperation from Rep. Gooden, the OCC could not verify whether Rep. Gooden applied the credits collected from a prior *personal* flight or an official one. If the former, then seeking reimbursement for a flight in which no expense was actually incurred would be in violation of House rules and federal law. Without cooperation from Rep. Gooden or relevant staff, the OCC could not verify such details regarding the purchase of this flight.

36. Due to the lack of cooperation from Rep. Gooden and his relevant staff, the OCC was unable to obtain documentation or testimony necessary to address these issues. As a result, the OCC could not determine whether the payments were in fact a result of administrative oversight, or a more substantive irregularity.

iii. Rep. Gooden's Car Rental/Rideshare Expenses

a. Extended Car Rental Periods

37. The 2025 Statements of Disbursements of the House indicate that Rep. Gooden received a combined total of $33,973 in reimbursements for transportation: $19,613.21 for car rentals[53] and $18,593.66 for rideshare services.[54] Although these expenses are not inherently prohibited, the OCC's review identified specific patterns of concern regarding the duration, overlap, and purpose of these expenditures.

38. A review of expense reimbursement forms, voucher forms, accompanying receipts, and copies of car rental agreements, revealed a pattern of extended, month-long rentals in the

[49] Members' Handbook at 6.
[50] *Id.* at 45.
[51] U.S. House of Representatives Expense Reimbursement Form and accompanying receipts and Voucher Cover Sheet, submitted September 5, 2025 (Exhibit 29 – 30 at 26-6164_0271).
[52] *United travel credits*, United Airlines, https://www.united.com/en/us/fly/travel/credit.html (last visited May 12, 2026).
[53] Statement of Disbursements of the House (January 1, 2025, to March 31, 2025); Statement of Disbursements of the House (April 1, 2025, to June 30, 2025); Statement of Disbursements of the House (July 1, 2025, to September 30, 2025); Statement of Disbursements of the House (October 1, 2025, to December 31, 2025).
[54] *Id.*

Dallas-Fort Worth area. Although routine car rentals can be a reasonable and necessary component of official travel for Members, the extended periods, listed below, raise questions regarding the necessity of a full-time rental to support official duties, particularly during weekends and holiday periods (see Table 3 below).

Name	Location	Dates	Amount
Rep. Gooden	Dallas Fort Worth	4/25/25 – 5/13/25	$2,885.77[55]
Rep. Gooden	Dallas Fort Worth	10/5/25 – 11/5/25	$2,883.97[56]
Rep. Gooden	Dallas Fort Worth	12/1/25 – 12/27/25	$2,364.84[57]

Table 3: Sample of car rental expenses based on official House records.

39. Although House rules and federal law do not impose an explicit cap on the duration of car rental agreements, these extended rental periods warrant further scrutiny.

40. Compounding those concerns, Rep. Gooden and relevant members of his staff declined to cooperate with the OCC's review, thus limiting the OCC from determining (1) who operated the vehicles, (2) whether the vehicles were retained at personal residences, and (3) what safeguards, if any, were implemented to ensure the rentals were not used for personal or campaign-related purposes. Moreover, the car rental agreements were executed in Rep. Gooden's name, further underscoring the need for transparency regarding how these cars were managed and utilized.

b. Overlapping Rental and Rideshare Expenses

41. The OCC identified multiple instances in which Rep. Gooden received MRA reimbursement for rideshare services, such as Lyft, on the same days he had an active car rental in his district. For example, between May 22 and June 2, 2025, Rep. Gooden submitted several Lyft receipts for travel throughout Austin and Dallas, Texas,[58] while simultaneously maintaining a car rental agreement executed in his name between May 16 and June 3, 2025.[59]

42. As noted above, since all car rental agreements and rideshares are booked under Rep. Gooden's name, his refusal to cooperate with this review has impeded the OCC's ability to verify who is using the rental car, who is using rideshare services, and whether such expenses are commensurate with the performance of Rep. Gooden's official duties.

[55] U.S. House of Representatives Expense Reimbursement Form and accompanying receipts and Voucher Cover Sheet, submitted May 13, 2025 (Exhibit 31 – 32 at 26-6164_0290).
[56] U.S. House of Representatives Expense Reimbursement Form and accompanying receipts and Voucher Cover Sheet, submitted November 13, 2025 (Exhibit 33 – 37 at 26-6164_0325).
[57] U.S. House of Representatives Expense Reimbursement Form and accompanying receipts and Voucher Cover Sheet, submitted December 30, 2025 (Exhibit 38 - 40 at 26-6164_0337).
[58] *See* U.S. House of Representatives Expense Reimbursement Form and accompanying receipts, submitted July 9, 2025 (Exhibit 41 at 26-6164_0341); U.S. House of Representatives Expense Reimbursement Form and accompanying receipts, submitted July 8, 2025 (Exhibit 42 at 26-6164_0410).
[59] U.S. House of Representatives Expense Reimbursement Form and accompanying receipts and Voucher Cover Sheet, submitted June 3, 2025 (Exhibit 43 – 44 at 26-6164_0487).

b. Potential Campaign-Related Use of Official Funds

43. The OCC also identified at least three instances in which MRA-reimbursed rideshare expenses closely aligned with campaign events reported to the Federal Election Commission ("FEC"). As shown in the chart below, Rep. Gooden's congressional campaign, the Lance Gooden for Congress Committee (the "Campaign Committee"), reported a $546.32 payment to the FEC for a campaign-related event held at Bullfeathers, a D.C. restaurant and bar.[60] On the same day as the event at Bullfeathers, Rep. Gooden incurred a rideshare expense (later reimbursed under the MRA) for a ride originating at the Washington Dulles Airport and ending at "412 1st Street SE, Washington, DC," which is steps away from Bullfeathers.[61]

Campaign Committee	Disbursement Date	Recipient	Disbursement Description	Disbursement Amount
Lance Gooden for Congress Committee	10/21/2025	Bullfeathers ("410 First Street SE, Washington, DC 20003")	"Event food & bev"	$546.32
Office Name	**Reimbursement Date (MRA)**	**Recipient**	**Reimbursement Description**	**Reimbursement Amount**
Rep. Lance Gooden	10/21/2025	Rep. Lance Gooden	Lyft: "Washington Dulles Airport → 412 1st St SE, Washington, DC"	$124.85

Table 4: Sample of campaign disbursements for transportation and dining on the same date and at or near the same location based on FEC records.

44. Furthermore, two MRA-reimbursed Lyft trips closely align with reported campaign expenditures at the Capital Grille in Washington, D.C. Although the dates differ by one day, the locations suggest a correlation.

45. FEC records show a $401.00 payment from the Campaign Committee to Capital Grille on April 3, 2025.[62] Records reviewed by the OCC show Rep. Gooden received a reimbursement

[60] *See* Lance Gooden for Congress Committee, FEC Form 3: Report of Receipts and Disbursements, at 27 (filed January 31, 2026), https://docquery.fec.gov/pdf/488/202601319795580488/202601319795580488.pdf.
[61] U.S. House of Representatives Expense Reimbursement Form and accompanying receipts, submitted December 22, 2025 (Exhibit 45 at 26-6164_0502 to 26-6164_0503).
[62] Lance Gooden for Congress Committee, FEC Form 3: Report of Receipts and Disbursements, at 57 (Filed October 21, 2025), https://docquery.fec.gov/pdf/652/202510219791976652/202510219791976652.pdf

under the MRA for a $20.99 Lyft service on April 2, 2025.[63] The drop-off address lists 601 Pennsylvania Ave NW, Washington, D.C., which is the address of the Capital Grille.[64] FEC records also show a $240.00 payment from the Campaign Committee to Capital Grille on May 21, 2025.[65] Records reviewed by the OCC show Rep. Gooden received a reimbursement under the MRA for a $104.60 Lyft service on May 20, 2025. [66] The Lyft service picked up Rep. Gooden (or a staff member) from Washington Dulles Airport and dropped off the passenger at 601 Pennsylvania Ave NW, Washington, D.C. – Capital Grille.[67]

46. Under House rules and federal law, the MRA may not be converted to personal or campaign use. The pattern of extended rentals, overlapping charges for rental vehicles and rideshare services, and proximity to campaign events, coupled with a lack of cooperation from Rep. Gooden, calls into question the legitimacy of these expenses and precluded the OCC from justifying these expenditures as "ordinary and necessary" for official duties.

47. Rep. Gooden's refusal to cooperate with the OCC's review is relevant to the Board's ultimate conclusion that there is substantial reason to believe that Rep. Gooden may have improperly sought travel-related reimbursement under the MRA for personal, campaign, or any unofficially related duties or responsibilities, or received reimbursement for travel expenditures that were not necessary or reasonably commensurate with the performance of his official duties.

III. REP. GOODEN'S CAMPAIGN COMMITTEE, LANCE GOODEN FOR CONGRESS COMMITTEE, MAY HAVE MISREPORTED OR FALSIFIED CAMPAIGN DISBURSEMENTS THAT MAY NOT HAVE BEEN ATTRIBUTABLE TO BONA FIDE CAMPAIGN OR POLITICAL PURPOSES.

A. Applicable Law, Rules, and Standards of Conduct

48. Federal Law

52 U.S.C. § 30114(b)(1)

"A contribution or donation [to a Member of Congress] shall not be converted by any person to personal use."

11 C.F.R. § 113.1(g)(1)(i) Personal Use Definition

[63] U.S. House of Representatives Expense Reimbursement Form and accompanying receipts, submitted July 7, 2025 (Exhibit 46 at 26-6164_0543 to 26-6164_0544).
[64] *Id.*
[65] Lance Gooden for Congress Committee, FEC Form 3: Report of Receipts and Disbursements, at 61 (Filed October 21, 2025), https://docquery.fec.gov/pdf/652/202510219791976652/202510219791976652.pdf
[66] U.S. House of Representatives Expense Reimbursement Form and accompanying receipts, submitted July 8, 2025 (Exhibit 42 at 26-6164_0436 to 26-6164_0437).
[67] *Id.*

"Personal use means any use of funds in a campaign account of a present or former candidate to fulfill a commitment, obligation or expense of any person that would exist irrespective of the candidate's campaign or duties as a Federal officeholder. . . .

"Personal use includes but is not limited to the use of funds in a campaign account for any item listed in paragraphs (g)(1)(i)(A) through (J) of this section . . . ."

49. FEC Guidance

According to the FEC:

> *A committee can reimburse a campaign traveler for travel expenses. It must report reimbursing the campaign traveler and, depending on the amount spent, provide information about the original travel vendors.*
> . . .
>
> *If the total amount reimbursed for a travel or subsistence expense is $500 or less, the committee should report the individual receiving the reimbursement as the payee.*
>
> . . .
>
> *If the total amount reimbursed for a travel or subsistence expense exceeds $500, the committee should:*
>
> - *Report the individual receiving the reimbursement as the payee*
> - *Report the payments aggregating over $200 to any one vendor as memo entries on Schedule B. Each memo entry must include the name and address of the vendor, as well as the date, amount and purpose of the payment.*[68]

FEC guidance also provides that:

> *Committees can pay for operating expenditures by charging a committee credit card. . . . Committees must itemize the credit card payment if payments exceed the $200 aggregate threshold during the election cycle. The committee must also itemize, as a memo entry, any specific transactions charged on a credit card if payments to the actual vendor exceed the $200 aggregate threshold. The memo entry must include the name and address of the vendor, the purpose of the disbursement, date the services were received, and the amount of the disbursement.*[69]

[68] *Travel Reimbursements*, FEC, https://www.fec.gov/help-candidates-and-committees/filing-reports/travel-reimbursements/ (last visited May 12, 2026).
[69] *Credit Card Disbursement*s, FEC, https://www.fec.gov/help-candidates-and-committees/filing-reports/credit-card-disbursements/ (last visited May 12, 2026).

50. House Rules

House Rule 23, clause 6 states, "A Member, Delegate, or Resident Commissioner— (a) shall keep the campaign funds of such individual separate from the personal funds of such individual; (b) may not convert campaign funds to personal use in excess of an amount representing reimbursement for legitimate and verifiable campaign expenditures; and (c) except as provided in clause 1(b) of rule XXIV, may not expend funds from a campaign account of such individual that are not attributable to bona fide campaign or political purposes."

51. House Ethics Manual

The House Ethics Manual states

> *Campaign funds are **not** to be used to enhance a Member's lifestyle, or to pay a Member's personal obligations. Members have wide discretion in determining what constitutes a bona fide campaign or political purpose to which campaign funds and resources may be devoted, but Members have **no** discretion whatsoever to convert campaign funds to personal use. Furthermore, House rules require that Members be able to verify that campaign funds have not been used for personal purposes.*[70]

Regarding verification requirements, the Manual emphasizes the following:

> *This requirement that the proper purpose of each outlay be "verifiable" is a commonsense requirement. With the huge number of outlays that Members' campaigns typically make, often on a nearly continuous basis, the propriety of particular outlays may not be subject to review for months or years after the fact, when recollections as to the circumstances or specific purposes of an outlay may well have faded. Absent a requirement for verification, the prohibition against converting campaign funds to personal use would be nullified in substantial part. Furthermore, the verification requirement should serve to cause Members and their campaign staffs to exercise caution in spending campaign funds, and to ensure that no outlay is for an impermissible personal purpose.*
>
> ***Members and their campaign staffs should bear in mind that the verification requirement imposed by the House rules is separate from, and in addition to, whatever recordkeeping requirements are imposed by the Federal Election Commission on federal candidates generally[.]***[71]

According to the House Ethics Manual, "a Member or employee must take reasonable steps to ensure that any outside organization over which he or she exercises control – including the individual's own authorized campaign committee … operates in compliance with applicable law."[72] *Additionally, "[a] Member's use of campaign funds for federal office is permissible only*

[70] House Ethics Manual at 182.
[71] *Id*. at 173 - 174 (internal citations omitted).
[72] *Id.* at 132.

*if it complies with the provisions of **both** the House Rules **and** [the Federal Election Campaign Act]."*[73]

B. Rep. Gooden's Campaign Committee, Lance Gooden for Congress Committee, May Have Misreported or Falsified Campaign Disbursements that May Not Have Been Attributable to Bona Fide Campaign or Political Purposes.

52. Pursuant to FEC rules, candidates for Congress must itemize committee credit card disbursements if payments exceed $200 in the aggregate for an election cycle, and itemize travel-related reimbursements to the specific recipient of those travel expenses if the total amount exceeds $500.[74] It is also prohibited under House rules, federal law, and FEC regulations for candidates to use campaign funds for personal use, as defined by the FEC.[75]

53. In this review, the OCC identified several discrepancies in FEC reports submitted by the Campaign Committee regarding credit card and travel-related reimbursements between 2025 and 2026. The OCC also identified campaign expenses between 2022 and 2024 that may not have been for bona fide campaign purposes. Without Rep. Gooden and relevant staff's cooperation, the OCC could not address or reconcile such inaccuracies and expenses reported to the FEC.

i. Credit Card Reimbursement Inaccuracies

54. As previously noted, the FEC requires committees to itemize credit card payments that exceed $200 in the aggregate during an election cycle. According to FEC records, between January 1, 2025, and February 11, 2026, the Campaign Committee reported 23 separate disbursements to "Chase Bank" amounting to a total of $256,465.77. *See FEC Disbursement Chart below*.

[73] *Id*. at 161.
[74] *See* FEC guidance above.
[75] *See* FEC personal use rule.

Spender	Recipient	State	Description	Disbursement date	Amount
LANCE GOODEN FOR CONGRESS COMMITTEE	CHASE BANK	NY	CREDIT CARD PMT	01/13/2025	$9,245.63
LANCE GOODEN FOR CONGRESS COMMITTEE	CHASE BANK	NY	CREDIT CARD PMT	01/27/2025	$6,757.47
LANCE GOODEN FOR CONGRESS COMMITTEE	CHASE BANK	NY	CREDIT CARD PMT	02/24/2025	$7,264.33
LANCE GOODEN FOR CONGRESS COMMITTEE	CHASE BANK	NY	CREDIT CARD PMT	03/06/2025	$6,100.00
LANCE GOODEN FOR CONGRESS COMMITTEE	CHASE BANK	NY	CREDIT CARD PMT	03/30/2025	$22,500.00
LANCE GOODEN FOR CONGRESS COMMITTEE	CHASE BANK	NY	CREDIT CARD PMT	04/23/2025	$8,831.69
LANCE GOODEN FOR CONGRESS COMMITTEE	CHASE BANK	NY	CREDIT CARD PMT	04/28/2025	$5,339.46
LANCE GOODEN FOR CONGRESS COMMITTEE	CHASE BANK	NY	CREDIT CARD PMT	06/03/2025	$8,911.64
LANCE GOODEN FOR CONGRESS COMMITTEE	CHASE BANK	NY	CREDIT CARD PMT	06/27/2025	$12,075.33
LANCE GOODEN FOR CONGRESS COMMITTEE	CHASE BANK	NY	CREDIT CARD PMT	07/10/2025	$9,155.92
LANCE GOODEN FOR CONGRESS COMMITTEE	CHASE BANK	NY	CREDIT CARD PMT	07/28/2025	$6,712.45
LANCE GOODEN FOR CONGRESS COMMITTEE	CHASE BANK	NY	CREDIT CARD PMT	08/20/2025	$7,476.91
LANCE GOODEN FOR CONGRESS COMMITTEE	CHASE BANK	NY	CREDIT CARD PMT	08/27/2025	$5,347.79
LANCE GOODEN FOR CONGRESS COMMITTEE	CHASE BANK	NY	CREDIT CARD PMT	09/29/2025	$9,718.79
LANCE GOODEN FOR CONGRESS COMMITTEE	CHASE BANK	NY	CREDIT CARD PMT	09/30/2025	$21,693.85
LANCE GOODEN FOR CONGRESS COMMITTEE	CHASE BANK	NY	CREDIT CARD PMT	10/21/2025	$8,234.83
LANCE GOODEN FOR CONGRESS COMMITTEE	CHASE BANK	NY	CREDIT CARD PMT	10/28/2025	$21,245.39
LANCE GOODEN FOR CONGRESS COMMITTEE	CHASE BANK	NY	CREDIT CARD PMT	11/28/2025	$14,600.00
LANCE GOODEN FOR CONGRESS COMMITTEE	CHASE BANK	NY	CREDIT CARD PMT	12/26/2025	$5,865.07
LANCE GOODEN FOR CONGRESS COMMITTEE	CHASE BANK	NY	CREDIT CARD PMT	12/31/2025	$14,684.01
LANCE GOODEN FOR CONGRESS COMMITTEE	CHASE BANK	NY	CREDIT CARD PMT	01/14/2026	$8,944.34
LANCE GOODEN FOR CONGRESS COMMITTEE	CHASE BANK	NY	CREDIT CARD PMT	02/07/2026	$14,043.84
LANCE GOODEN FOR CONGRESS COMMITTEE	CHASE BANK	NY	CREDIT CARD PMT	02/11/2026	$21,717.03

Figure 3: Screenshot of reported FEC disbursements from the Campaign Committee for 2025–2026.

55. Because Rep. Gooden and his campaign treasurer, Mr. Robert Phillips III, did not cooperate with this review, the OCC could not verify the ownership of the Chase credit card account. In the absence of this information, the OCC has treated these as committee held accounts.

56. In reviewing the Chase disbursements, the OCC cross-referenced the itemized entries associated with each Chase payment using the specific "Transaction ID" stamp listed on the reports. As a result, the OCC identified discrepancies between the total credit card

disbursements and the sums reflected in their corresponding itemized entries as shown in the chart below.

Disbursement Date	Chase Disbursement Amount	Total Itemization Amount
1/13/2025	$9,245.63[76]	$8,938.86[77]
1/27/2025	$6,757.47[78]	$6,328.95[79]
2/24/2025	$7,264.33[80]	$6,822.83[81]
3/6/2025	$6,100[82]	$6,005.70[83]
3/30/2025	$22,500[84]	$19,766.52[85]
4/23/2025	$8,831.69[86]	$7,974.24[87]
4/28/2025	$5,339.46[88]	$4,281.15[89]
6/3/2025	$8,911.64[90]	$8,732.65[91]
6/27/2025	$12,075.33[92]	$10,858.36[93]
7/10/2025	$9,155.92[94]	$9,155.92[95]
7/28/2025	$6,712.45[96]	$4,811.64[97]
8/20/2025	$7,476.91[98]	$5,925.71[99]
8/27/2025	$5,347.79[100]	$5,218.68[101]

[76] Lance Gooden for Congress Committee, FEC Form 3: Report of Receipts and Disbursements, at 30, 45 (filed July 9, 2025), https://docquery.fec.gov/pdf/506/202507099762742506/202507099762742506.pdf.
[77] *Id.* at 30-31.
[78] *Id.* at 31.
[79] *Id.* at 32-33.
[80] *Id.* at 33.
[81] *Id.* at 33-35.
[82] *Id.* at 35.
[83] *Id.* at 35-37.
[84] *Id.* at 37.
[85] *Id.* at 37-42.
[86] Lance Gooden for Congress Committee, FEC Form 3: Report of Receipts and Disbursements, at 57, 68 (filed October 21, 2025), https://docquery.fec.gov/pdf/652/202510219791976652/202510219791976652.pdf.
[87] *Id.* at 57-59.
[88] *Id.* at 60.
[89] *Id.*
[90] *Id.* at 61.
[91] *Id.* at 61-63.
[92] *Id.* at 63.
[93] *Id.* at 63-66.
[94] Lance Gooden for Congress Committee, FEC Form 3: Report of Receipts and Disbursements, at 27 (filed October 15, 2025), https://docquery.fec.gov/pdf/746/202510159791315746/202510159791315746.pdf.
[95] *Id.* at 27-28.
[96] *Id.* at 28.
[97] *Id.* at 29-31.
[98] *Id.* at 32.
[99] *Id.* at 32-33.
[100] *Id.* at 33.
[101] *Id.* at 33-34.

9/29/2025	$9,718.79[102]	$10,000.00[103]
9/30/2025	$21,693.85[104]	$20,857.58[105]
10/21/2025	$8,234.83[106]	$7,348.61[107]
10/28/2025	$21,245.39[108]	$20,947.67[109]
11/28/2025	$14,600[110]	$14,488.24[111]
12/26/2025	$5,865.07[112]	$5,398[113]
12/31/2025	$14,684.01[114]	$14,433.94[115]
1/14/2026	$8,944.34[116]	$8,845.18[117]
2/7/2026	$14,043.84[118]	$13,731.48[119]
2/11/2026	$21,717.03[120]	$21,520.47[121]

Table 5: Comparison of Campaign Committee disbursements to total itemized amounts from FEC records.

57. As reflected in the chart, the FEC data reveals several discrepancies between the total credit card disbursements and the sum of their corresponding itemized entries. For nearly every disbursement listed, the itemized values fail to account for the total amount charged. Specifically, only a single transaction, a $9,155.92 disbursement on July 10, 2025, reconciled exactly. Conversely, the September 29, 2025 disbursement of $9,718.79 shows the total of the entry exceeding the disbursement by approximately $300.

58. At a minimum, these inconsistencies suggest deficient or negligent accounting practices. On the other hand, they raise concerns that the Campaign Committee may be misreporting financial activity to obscure potentially improper expenditures. While some variance could be attributable to non-itemized expenses falling below the $200 reporting threshold, Rep.

[102] *Id.* at 34.
[103] *Id.* at 34-35.
[104] *Id.* at 35.
[105] *Id.* at 36-39.
[106] Lance Gooden for Congress Committee, FEC Form 3: Report of Receipts and Disbursements, at 23 (filed January 31, 2026), https://docquery.fec.gov/pdf/488/202601319795580488/202601319795580488.pdf.
[107] *Id.* at 23-25.
[108] *Id.* at 25.
[109] *Id.* at 25-28.
[110] *Id.* at 28.
[111] *Id.* at 28-30.
[112] *Id.* at 31.
[113] *Id.*
[114] *Id.* at 32.
[115] *Id.* at 32-34.
[116] Lance Gooden for Congress Committee, FEC Form 3: Report of Receipts and Disbursements, at 22 (filed Feb. 19, 2026), https://docquery.fec.gov/pdf/527/202602199834794527/202602199834794527.pdf.
[117] *Id.* at 23-26.
[118] *Id.* at 26.
[119] *Id.* at 27-29.
[120] *Id.* at 29.
[121] *Id.* at 29- 31.

Gooden and Mr. Phillips's lack of cooperation prevented the OCC from reconciling these discrepancies or verifying the reported payments were made for their stated campaign purpose.

ii. Travel Reimbursement Inaccuracies

59. Between 2025 and 2026, the Campaign Committee reported 58 separate travel disbursements to the FEC, totaling $112,2450.32.[122] These payments were made to various airlines: American Airlines, United Airlines, Alaska Airlines, Qatar Airways, and Air France.[123] *See FEC Disbursements Chart below.*

Spender	Recipient	State	Description	Disbursement date	Amount
LANCE GOODEN FOR CONGRESS COMMITTEE	QATAR AIRWAYS	ZZ	TRAVEL FLIGHT EXPENSE	01/05/2025	$6,939.45
LANCE GOODEN FOR CONGRESS COMMITTEE	AMERICAN AIRLINES	TX	TRAVEL FLIGHT EXPENSE	01/05/2025	$1,533.14
LANCE GOODEN FOR CONGRESS COMMITTEE	AMERICAN AIRLINES	TX	TRAVEL FLIGHT EXPENSE	01/05/2025	$2,179.78
LANCE GOODEN FOR CONGRESS COMMITTEE	AMERICAN AIRLINES	TX	TRAVEL FLIGHT EXPENSE	01/27/2025	$439.93
LANCE GOODEN FOR CONGRESS COMMITTEE	UNITED AIRLINES	IL	TRAVEL FLIGHT EXPENSE	02/01/2025	$1,342.96
LANCE GOODEN FOR CONGRESS COMMITTEE	UNITED AIRLINES	IL	TRAVEL FLIGHT EXPENSE	02/05/2025	$702.94
LANCE GOODEN FOR CONGRESS COMMITTEE	UNITED AIRLINES	IL	TRAVEL FLIGHT EXPENSE	02/05/2025	$2,319.11
LANCE GOODEN FOR CONGRESS COMMITTEE	QATAR AIRWAYS	ZZ	TRAVEL FLIGHT EXPENSE	02/09/2025	$2,513.12
LANCE GOODEN FOR CONGRESS COMMITTEE	ALASKA AIRLINES	WA	TRAVEL FLIGHT EXPENSE	02/10/2025	$255.30
LANCE GOODEN FOR CONGRESS COMMITTEE	AMERICAN AIRLINES	TX	TRAVEL FLIGHT EXPENSE	03/17/2025	$818.49
LANCE GOODEN FOR CONGRESS COMMITTEE	UNITED AIRLINES	IL	TRAVEL FLIGHT EXPENSE	03/17/2025	$1,435.47
LANCE GOODEN FOR CONGRESS COMMITTEE	UNITED AIRLINES	IL	TRAVEL FLIGHT EXPENSE	03/18/2025	$2,949.77
LANCE GOODEN FOR CONGRESS COMMITTEE	UNITED AIRLINES	IL	TRAVEL FLIGHT EXPENSE	03/27/2025	$1,269.38
LANCE GOODEN FOR CONGRESS COMMITTEE	UNITED AIRLINES	IL	TRAVEL FLIGHT EXPENSE	04/06/2025	$1,268.90
LANCE GOODEN FOR CONGRESS COMMITTEE	UNITED AIRLINES	IL	TRAVEL FLIGHT EXPENSE	04/18/2025	$2,788.41
LANCE GOODEN FOR CONGRESS COMMITTEE	AMERICAN AIRLINES	TX	TRAVEL FLIGHT EXPENSE	04/23/2025	$1,715.28
LANCE GOODEN FOR CONGRESS COMMITTEE	UNITED AIRLINES	IL	TRAVEL FLIGHT EXPENSE	05/07/2025	$4,282.22
LANCE GOODEN FOR CONGRESS COMMITTEE	AMERICAN AIRLINES	TX	TRAVEL FLIGHT EXPENSE	06/02/2025	$2,955.93
LANCE GOODEN FOR CONGRESS COMMITTEE	UNITED AIRLINES	IL	TRAVEL FLIGHT EXPENSE	06/25/2025	$3,592.81
LANCE GOODEN FOR CONGRESS COMMITTEE	AMERICAN AIRLINES	TX	TRAVEL FLIGHT EXPENSE	06/27/2025	$1,263.48
LANCE GOODEN FOR CONGRESS COMMITTEE	UNITED AIRLINES	IL	TRAVEL FLIGHT EXPENSE	07/07/2025	$762.17
LANCE GOODEN FOR CONGRESS COMMITTEE	UNITED AIRLINES	IL	TRAVEL FLIGHT EXPENSE	07/07/2025	$1,655.92
LANCE GOODEN FOR CONGRESS COMMITTEE	UNITED AIRLINES	IL	TRAVEL FLIGHT EXPENSE	07/10/2025	$1,319.11
LANCE GOODEN FOR CONGRESS COMMITTEE	AMERICAN AIRLINES	TX	TRAVEL FLIGHT EXPENSE	07/18/2025	$633.81
LANCE GOODEN FOR CONGRESS COMMITTEE	UNITED AIRLINES	IL	TRAVEL FLIGHT EXPENSE	07/29/2025	$2,205.71
LANCE GOODEN FOR CONGRESS COMMITTEE	UNITED AIRLINES	IL	TRAVEL FLIGHT EXPENSE	08/31/2025	$4,851.60
LANCE GOODEN FOR CONGRESS COMMITTEE	UNITED AIRLINES	IL	TRAVEL FLIGHT EXPENSE	09/21/2025	$1,688.34
LANCE GOODEN FOR CONGRESS COMMITTEE	UNITED AIRLINES	IL	TRAVEL FLIGHT EXPENSE	09/27/2025	$1,109.00

[122] *Id.*

[123] *Browse Disbursements,* FEC, https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00662601&recipient_name=Air&recipient_name=Airlines&recipient_name=Airways&two_year_transaction_period=2026 (last visited May 12, 2026).

LANCE GOODEN FOR CONGRESS COMMITTEE	AMERICAN AIRLINES	TX	TRAVEL FLIGHT EXPENSE	09/27/2025	$778.10
LANCE GOODEN FOR CONGRESS COMMITTEE	UNITED AIRLINES	IL	TRAVEL FLIGHT EXPENSE	10/01/2025	$1,347.93
LANCE GOODEN FOR CONGRESS COMMITTEE	UNITED AIRLINES	IL	TRAVEL FLIGHT EXPENSE	10/13/2025	$1,393.10
LANCE GOODEN FOR CONGRESS COMMITTEE	AMERICAN AIRLINES	TX	TRAVEL FLIGHT EXPENSE	10/16/2025	$1,394.50
LANCE GOODEN FOR CONGRESS COMMITTEE	UNITED AIRLINES	IL	TRAVEL FLIGHT EXPENSE	12/02/2025	$1,898.00
LANCE GOODEN FOR CONGRESS COMMITTEE	UNITED AIRLINES	IL	TRAVEL FLIGHT EXPENSE	12/05/2025	$2,298.33
LANCE GOODEN FOR CONGRESS COMMITTEE	UNITED AIRLINES	IL	TRAVEL FLIGHT EXPENSE	12/19/2025	$1,492.09
LANCE GOODEN FOR CONGRESS COMMITTEE	UNITED AIRLINES	IL	TRAVEL FLIGHT EXPENSE	12/27/2025	$2,704.00
LANCE GOODEN FOR CONGRESS COMMITTEE	UNITED AIRLINES	IL	TRAVEL FLIGHT EXPENSE	01/05/2026	$1,309.55
LANCE GOODEN FOR CONGRESS COMMITTEE	AMERICAN AIRLINES	TX	TRAVEL FLIGHT EXPENSE	01/08/2026	$1,793.19
LANCE GOODEN FOR CONGRESS COMMITTEE	UNITED AIRLINES	IL	TRAVEL FLIGHT EXPENSE	01/14/2026	$1,433.89
LANCE GOODEN FOR CONGRESS COMMITTEE	QATAR AIRWAYS	ZZ	TRAVEL FLIGHT EXPENSE	01/14/2026	$1,327.93
LANCE GOODEN FOR CONGRESS COMMITTEE	UNITED AIRLINES	IL	TRAVEL FLIGHT EXPENSE	01/25/2026	$2,105.30
LANCE GOODEN FOR CONGRESS COMMITTEE	AIR FRANCE	NY	TRAVEL FLIGHT EXPENSE	02/07/2026	$1,497.53
LANCE GOODEN FOR CONGRESS COMMITTEE	QATAR AIRWAYS	ZZ	TRAVEL FLIGHT EXPENSE	02/07/2026	$1,253.55
LANCE GOODEN FOR CONGRESS COMMITTEE	AMERICAN AIRLINES	TX	TRAVEL FLIGHT EXPENSE	02/07/2026	$1,403.01
LANCE GOODEN FOR CONGRESS COMMITTEE	UNITED AIRLINES	IL	TRAVEL FLIGHT EXPENSE	02/09/2026	$3,552.29
LANCE GOODEN FOR CONGRESS COMMITTEE	AMERICAN AIRLINES	TX	TRAVEL FLIGHT EXPENSE	02/25/2026	$818.30
LANCE GOODEN FOR CONGRESS COMMITTEE	UNITED AIRLINES	IL	TRAVEL FLIGHT EXPENSE	02/26/2026	$910.52
LANCE GOODEN FOR CONGRESS COMMITTEE	UNITED AIRLINES	IL	TRAVEL FLIGHT EXPENSE	02/27/2026	$1,270.02
LANCE GOODEN FOR CONGRESS COMMITTEE	UNITED AIRLINES	IL	TRAVEL FLIGHT EXPENSE	02/28/2026	$3,233.50
LANCE GOODEN FOR CONGRESS COMMITTEE	UNITED AIRLINES	IL	TRAVEL FLIGHT EXPENSE	03/07/2026	$1,913.60
LANCE GOODEN FOR CONGRESS COMMITTEE	UNITED AIRLINES	IL	TRAVEL FLIGHT EXPENSE	03/09/2026	$855.00
LANCE GOODEN FOR CONGRESS COMMITTEE	AMERICAN AIRLINES	TX	TRAVEL FLIGHT EXPENSE	03/11/2026	$990.49
LANCE GOODEN FOR CONGRESS COMMITTEE	UNITED AIRLINES	IL	TRAVEL FLIGHT EXPENSE	03/13/2026	$1,673.60
LANCE GOODEN FOR CONGRESS COMMITTEE	UNITED AIRLINES	IL	TRAVEL FLIGHT EXPENSE	03/19/2026	$1,816.90
LANCE GOODEN FOR CONGRESS COMMITTEE	QATAR AIRWAYS	ZZ	TRAVEL FLIGHT EXPENSE	03/25/2026	$9,152.49
LANCE GOODEN FOR CONGRESS COMMITTEE	AMERICAN AIRLINES	TX	TRAVEL FLIGHT EXPENSE	03/27/2026	$832.80
LANCE GOODEN FOR CONGRESS COMMITTEE	UNITED AIRLINES	IL	TRAVEL FLIGHT EXPENSE	03/27/2026	$1,485.60

Figure 4: Screenshot of FEC Disbursements to Various Airlines in 2025-2026.

60. The FEC requires travel-related reimbursements over $500 to be reported a specific way: the campaign committee must (1) report the individual who received the reimbursement as the payee, and (2) report the payments aggregating over $200 to any one vendor as memo entries on Schedule B.[124]

61. Here, the Campaign Committee's reported flight disbursements, as shown above, clearly exceed the required $500 threshold for reporting purposes. None of the flight disbursements, however, identify who traveled on these flights. Rather, some of these airline expenses were itemized under the Chase disbursements discussed in the section above.

62. Despite numerous flight expenditures, the OCC identified only two lodging expenses for the 2025–2026 period: a $2,120.29 stay at the Hilton in Fort Lauderdale, Florida on October 14,

[124] *Travel Reimbursements,* FEC, https://www.fec.gov/help-candidates-and-committees/filing-reports/travel-reimbursements/ (last visited May 12, 2026).

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

2025,[125], and a $609.50 stay at the Hyatt Regency in Coral Gables, Florida on January 29, 2026.[126] *See Figures 5–6 below.*

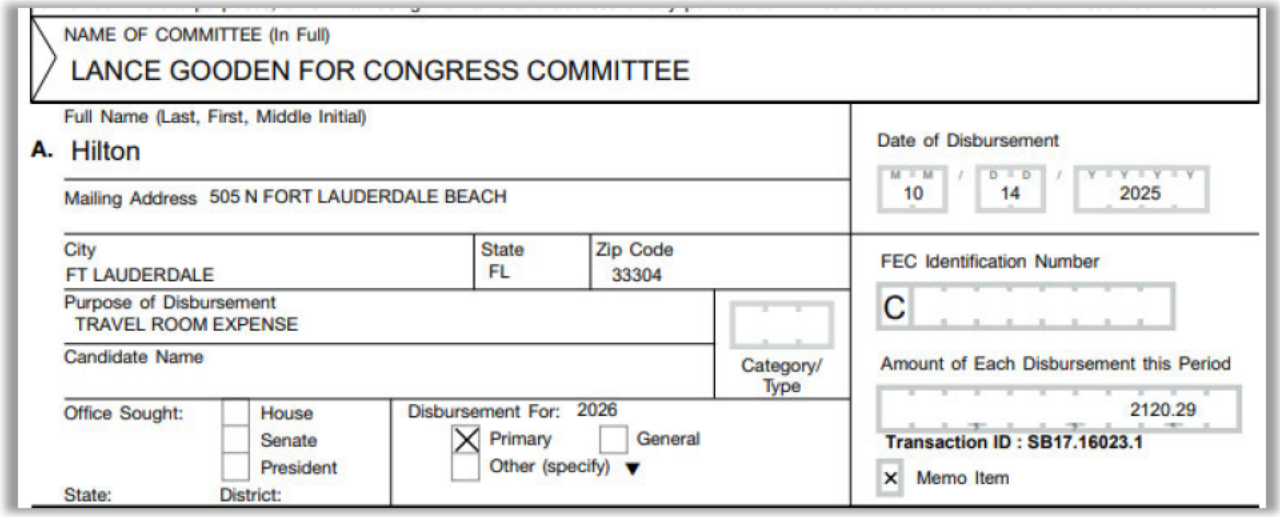

NAME OF COMMITTEE (In Full)
LANCE GOODEN FOR CONGRESS COMMITTEE
Full Name (Last, First, Middle Initial)
A. Hilton
Mailing Address 505 N FORT LAUDERDALE BEACH
City FT LAUDERDALE
State FL
Zip Code 33304
Purpose of Disbursement TRAVEL ROOM EXPENSE
Candidate Name
Category/ Type
Office Sought: House Senate President
State: District:
Disbursement For: 2026
Primary General
Other (specify)
Date of Disbursement 10 / 14 / 2025
FEC Identification Number C
Amount of Each Disbursement this Period 2120.29
Transaction ID : SB17.16023.1
Memo Item

Figure 5: Screenshot of FEC Report Showing $2,120.29 Expense at the Hilton (Ft. Lauderdale, Florida)

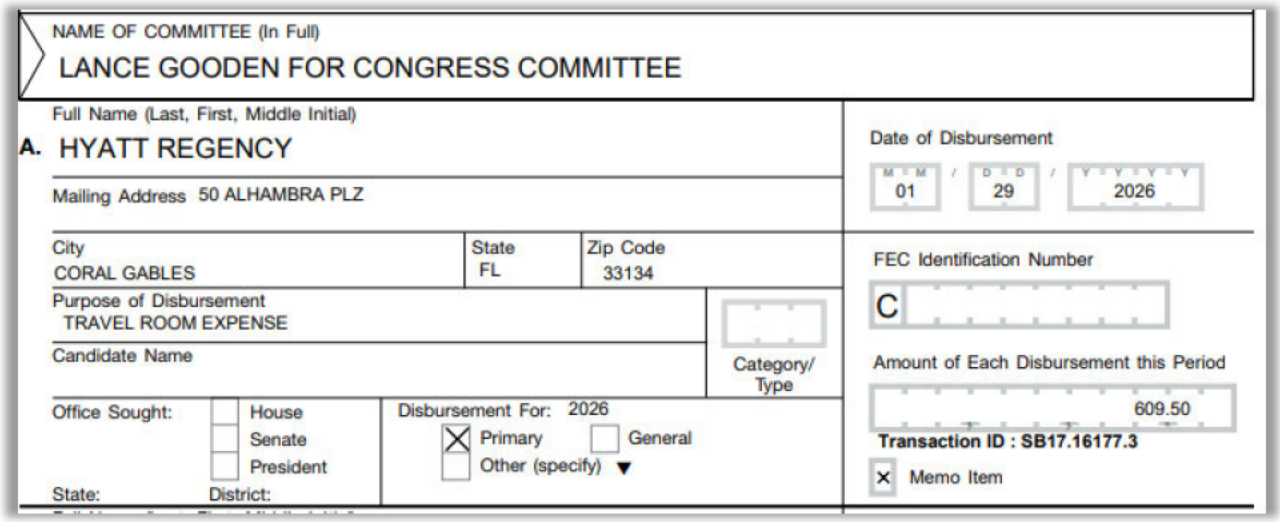

NAME OF COMMITTEE (In Full)
LANCE GOODEN FOR CONGRESS COMMITTEE
Full Name (Last, First, Middle Initial)
A. HYATT REGENCY
Mailing Address 50 ALHAMBRA PLZ
City CORAL GABLES
State FL
Zip Code 33134
Purpose of Disbursement TRAVEL ROOM EXPENSE
Candidate Name
Category/ Type
Office Sought: House Senate President
State: District:
Disbursement For: 2026
Primary General
Other (specify)
Date of Disbursement 01 / 29 / 2026
FEC Identification Number C
Amount of Each Disbursement this Period 609.50
Transaction ID : SB17.16177.3
Memo Item

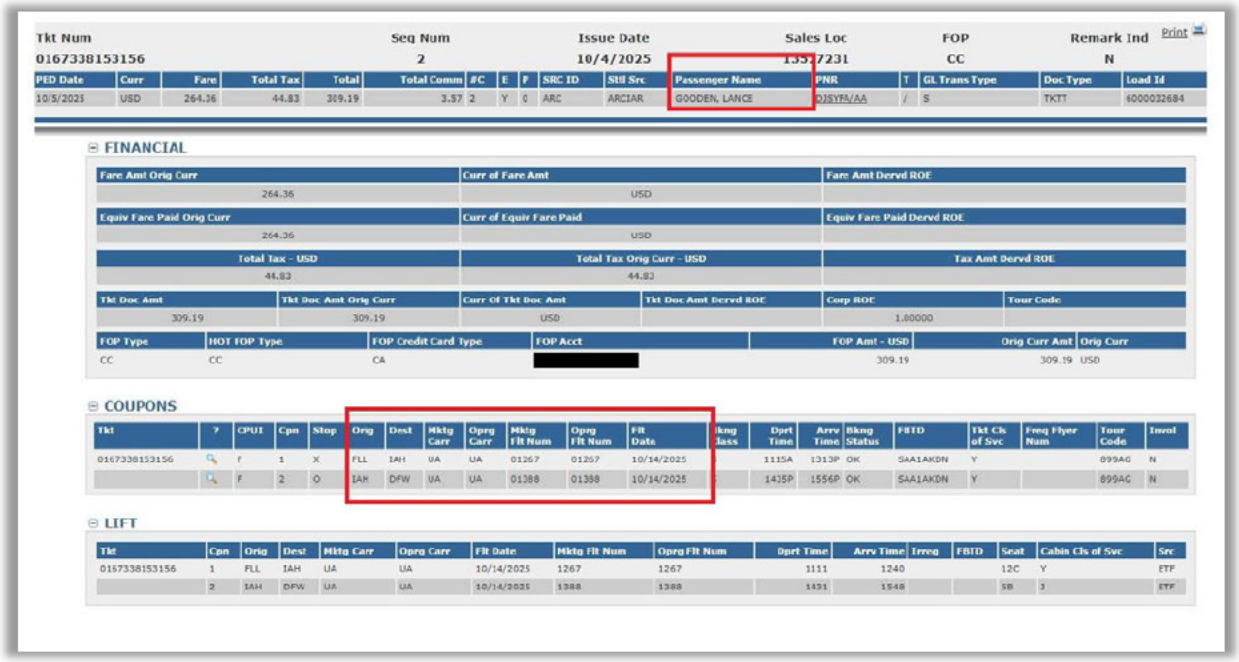
Figure 6: Screenshot of FEC Report Showing $609.50 Expense at the Hyatt Regency (Coral Gables, Florida)

63. While the FEC reports do not identify the individuals reimbursed for these lodging expenses, the OCC's independent review of flight records revealed the following: on October 14, 2025,

[125] Lance Gooden for Congress Committee, FEC Form 3: Report of Receipts and Disbursements, at 26 (Filed January 31, 2026), https://docquery.fec.gov/pdf/488/202601319795580488/202601319795580488.pdf.
[126] Lance Gooden for Congress Committee, FEC Form 3: Report of Receipts and Disbursements, at 28 (Filed Feb. 19, 2026), https://docquery.fec.gov/pdf/527/202602199834794527/202602199834794527.pdf.

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

Rep. Gooden traveled to Ft. Lauderdale, Florida with his daughter, aligning with the Hilton stay; on January 29, 2026, Rep. Gooden traveled to Ft. Lauderdale, Florida, and departed from Miami, Florida on February 1, 2026, with his son, which aligns with the Hyatt Regency stay. *See airline data below.*



Tkt Num: 0167338153156 | Seq Num: 2 | Issue Date: 10/4/2025 | Sales Loc: 13527231 | FOP: CC | Remark Ind: N | Print

PED Date	Curr	Fare	Total Tax	Total	Total Comm	#C	E	P	SRC ID	Stl Src	Passenger Name	PNR	T	GL Trans Type	Doc Type	Load Id
10/5/2025	USD	264.36	44.83	309.19	3.57	2	Y	0	ARC	ARCIAR	GOODEN, LANCE	OJSYFA/AA	/	S	TKTT	6000032684

FINANCIAL

Fare Amt Orig Curr	Curr of Fare Amt	Fare Amt Dervd ROE
264.36	USD	

Equiv Fare Paid Orig Curr	Curr of Equiv Fare Paid	Equiv Fare Paid Dervd ROE
264.36	USD	

Total Tax - USD	Total Tax Orig Curr - USD	Tax Amt Dervd ROE
44.83	44.83	

Tkt Doc Amt	Tkt Doc Amt Orig Curr	Curr Of Tkt Doc Amt	Tkt Doc Amt Dervd ROE	Corp ROE	Tour Code
309.19	309.19	USD		1.00000	

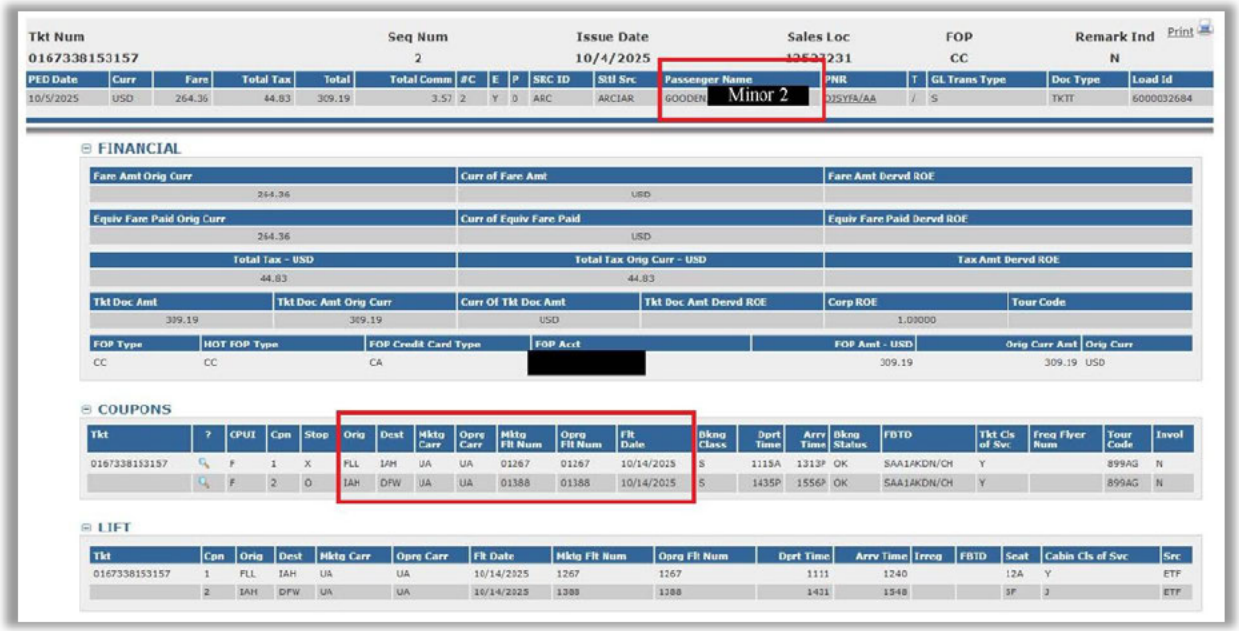
FOP Type	HOT FOP Type	FOP Credit Card Type	FOP Acct	FOP Amt - USD	Orig Curr Amt	Orig Curr
CC	CC	CA	[redacted]	309.19	309.19	USD

COUPONS

Tkt	?	CPUI	Cpn	Stop	Orig	Dest	Mktg Carr	Oprg Carr	Mktg Flt Num	Oprg Flt Num	Flt Date	Bkng Class	Dprt Time	Arrv Time	Bkng Status	FBTD	Tkt Cls of Svc	Freq Flyer Num	Tour Code	Invol
0167338153156		F	1	X	FLL	IAH	UA	UA	01267	01267	10/14/2025		1115A	1313P	OK	SAA1AKDN	Y		899AG	N
		F	2	O	IAH	DFW	UA	UA	01388	01388	10/14/2025		1435P	1556P	OK	SAA1AKDN	Y		899AG	N

LIFT

Tkt	Cpn	Orig	Dest	Mktg Carr	Oprg Carr	Flt Date	Mktg Flt Num	Oprg Flt Num	Dprt Time	Arrv Time	Irreg	FBTD	Seat	Cabin Cls of Svc	Src
0167338153156	1	FLL	IAH	UA	UA	10/14/2025	1267	1267	1111	1240			12C	Y	ETF
	2	IAH	DFW	UA	UA	10/14/2025	1388	1388	1431	1548			5B	J	ETF



Tkt Num: 0167338153157 | Seq Num: 2 | Issue Date: 10/4/2025 | Sales Loc: 13527231 | FOP: CC | Remark Ind: N | Print

PED Date	Curr	Fare	Total Tax	Total	Total Comm	#C	E	P	SRC ID	Stl Src	Passenger Name	PNR	T	GL Trans Type	Doc Type	Load Id
10/5/2025	USD	264.36	44.83	309.19	3.57	2	Y	0	ARC	ARCIAR	GOODEN Minor 2	OJSYFA/AA	/	S	TKTT	6000032684

FINANCIAL

Fare Amt Orig Curr	Curr of Fare Amt	Fare Amt Dervd ROE
264.36	USD	

Equiv Fare Paid Orig Curr	Curr of Equiv Fare Paid	Equiv Fare Paid Dervd ROE
264.36	USD	

Total Tax - USD	Total Tax Orig Curr - USD	Tax Amt Dervd ROE
44.83	44.83	

Tkt Doc Amt	Tkt Doc Amt Orig Curr	Curr Of Tkt Doc Amt	Tkt Doc Amt Dervd ROE	Corp ROE	Tour Code
309.19	309.19	USD		1.00000	

FOP Type	HOT FOP Type	FOP Credit Card Type	FOP Acct	FOP Amt - USD	Orig Curr Amt	Orig Curr
CC	CC	CA	[redacted]	309.19	309.19	USD

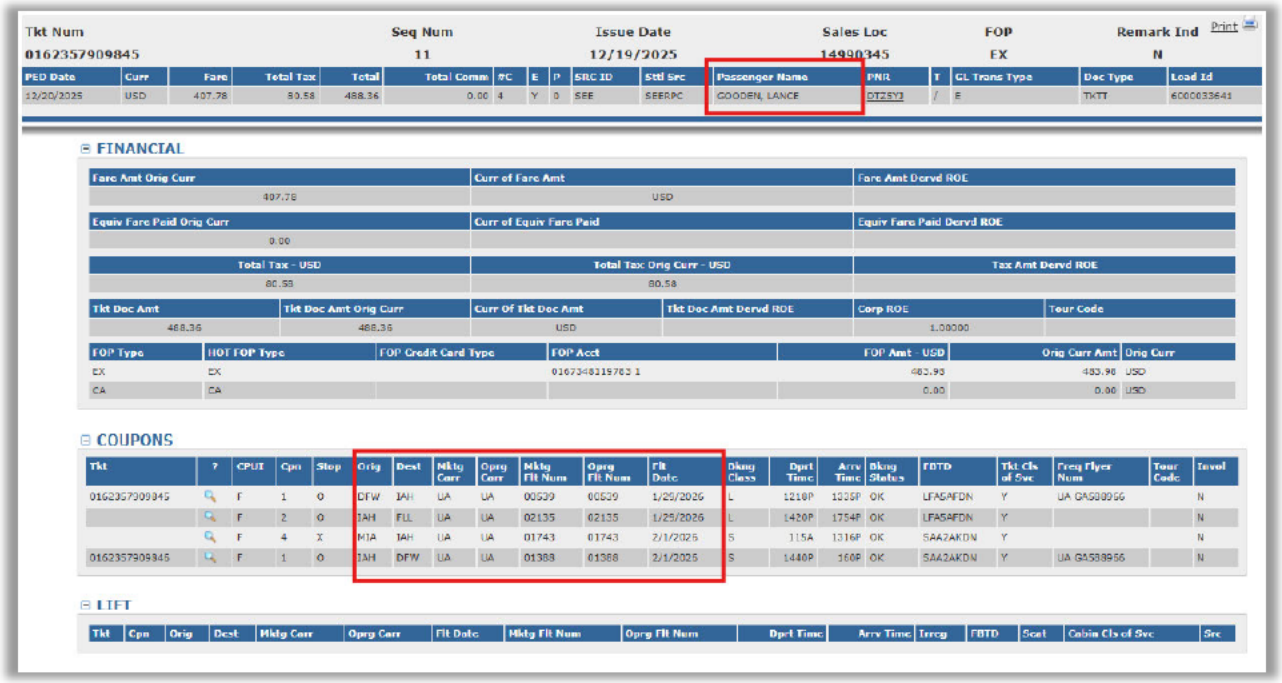
COUPONS

Tkt	?	CPUI	Cpn	Stop	Orig	Dest	Mktg Carr	Oprg Carr	Mktg Flt Num	Oprg Flt Num	Flt Date	Bkng Class	Dprt Time	Arrv Time	Bkng Status	FBTD	Tkt Cls of Svc	Freq Flyer Num	Tour Code	Invol
0167338153157		F	1	X	FLL	IAH	UA	UA	01267	01267	10/14/2025	S	1115A	1313P	OK	SAA1AKDN/CH	Y		899AG	N
		F	2	O	IAH	DFW	UA	UA	01388	01388	10/14/2025	S	1435P	1556P	OK	SAA1AKDN/CH	Y		899AG	N

LIFT

Tkt	Cpn	Orig	Dest	Mktg Carr	Oprg Carr	Flt Date	Mktg Flt Num	Oprg Flt Num	Dprt Time	Arrv Time	Irreg	FBTD	Seat	Cabin Cls of Svc	Src
0167338153157	1	FLL	IAH	UA	UA	10/14/2025	1267	1267	1111	1240			12A	Y	ETF
	2	IAH	DFW	UA	UA	10/14/2025	1388	1388	1431	1548			3F	J	ETF

Figure 7: October 14, 2026 Flight record for Rep. Gooden and his daughter – Flight was from Florida to Dallas Fort Worth



Tkt Num	Seq Num	Issue Date	Sales Loc	FOP	Remark Ind
0162357909845	11	12/19/2025	14990345	EX	N

PED Date	Curr	Fare	Total Tax	Total	Total Comm	#C	E	P	SRC ID	Stll Src	Passenger Name	PNR	T	GL Trans Type	Doc Type	Load Id
12/20/2025	USD	407.78	80.58	488.36	0.00	4	Y	0	SEE	SEERPC	GOODEN, LANCE	DTZSYJ	/	E	TKTT	6000033641

FINANCIAL

Fare Amt Orig Curr	Curr of Fare Amt	Fare Amt Dervd ROE
407.78	USD	

Equiv Fare Paid Orig Curr	Curr of Equiv Fare Paid	Equiv Fare Paid Dervd ROE
0.00		

Total Tax - USD	Total Tax Orig Curr - USD	Tax Amt Dervd ROE
80.58	80.58	

Tkt Doc Amt	Tkt Doc Amt Orig Curr	Curr Of Tkt Doc Amt	Tkt Doc Amt Dervd ROE	Corp ROE	Tour Code
488.36	488.36	USD		1.00000	

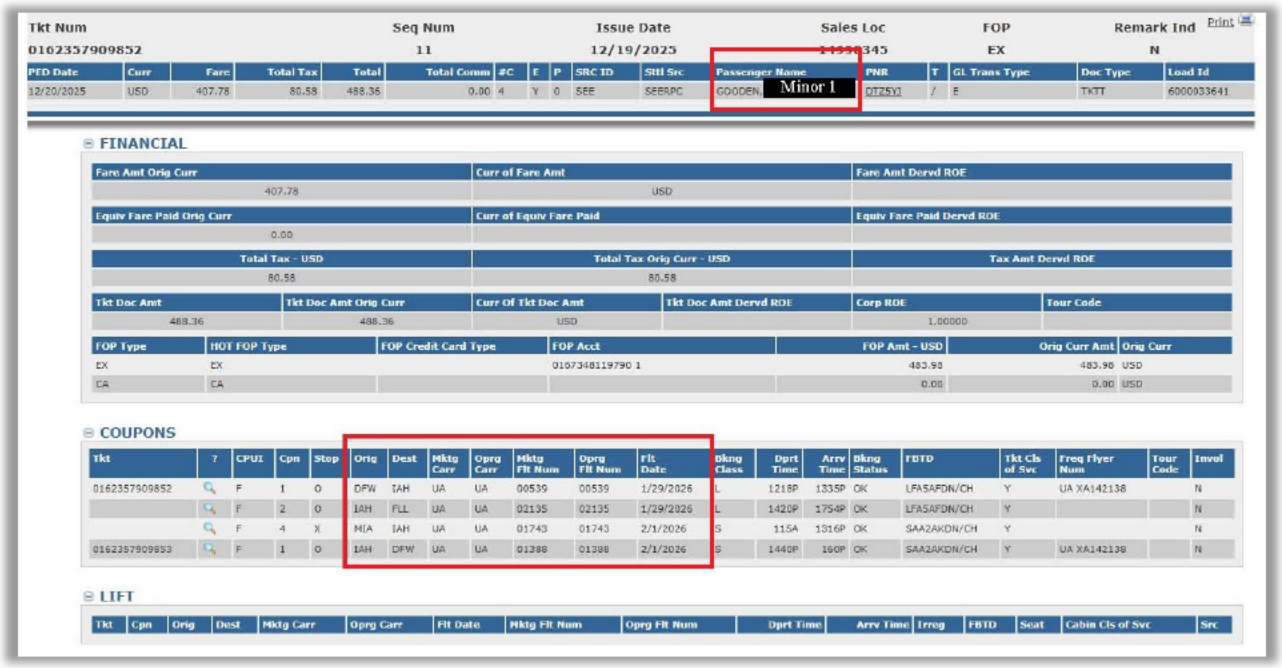
FOP Type	HOT FOP Type	FOP Credit Card Type	FOP Acct	FOP Amt - USD	Orig Curr Amt	Orig Curr
EX	EX		0167348119782 1	488.36	488.36	USD
CA	CA			0.00	0.00	USD

COUPONS

Tkt	?	CPUI	Cpn	Stop	Orig	Dest	Mktg Carr	Oprg Carr	Mktg Flt Num	Oprg Flt Num	Flt Date	Bkng Class	Dprt Time	Arrv Time	Bkng Status	FBTD	Tkt Cls of Svc	Freq Flyer Num	Tour Code	Invol
0162357909845		F	1	O	DFW	IAH	UA	UA	00539	00539	1/29/2026	L	1210P	1335P	OK	LFA5AFDN	Y	UA GA588956		N
		F	2	O	IAH	FLL	UA	UA	02135	02135	1/29/2026	L	1420P	1754P	OK	LFA5AFDN	Y			N
		F	4	X	MIA	IAH	UA	UA	01743	01743	2/1/2026	S	115A	1316P	OK	SAA2AKDN	Y			N
0162357909845		F	1	O	IAH	DFW	UA	UA	01388	01388	2/1/2026	S	1440P	160P	OK	SAA2AKDN	Y	UA GA588956		N

LIFT

Tkt	Cpn	Orig	Dest	Mktg Carr	Oprg Carr	Flt Date	Mktg Flt Num	Oprg Flt Num	Dprt Time	Arrv Time	Trreg	FBTD	Seat	Cabin Cls of Svc	Src



Tkt Num	Seq Num	Issue Date	Sales Loc	FOP	Remark Ind
0162357909852	11	12/19/2025	14990345	EX	N

PED Date	Curr	Fare	Total Tax	Total	Total Comm	#C	E	P	SRC ID	Stll Src	Passenger Name	PNR	T	GL Trans Type	Doc Type	Load Id
12/20/2025	USD	407.78	80.58	488.36	0.00	4	Y	0	SEE	SEERPC	GOODEN, Minor 1	DTZSYJ	/	E	TKTT	6000033641

FINANCIAL

Fare Amt Orig Curr	Curr of Fare Amt	Fare Amt Dervd ROE
407.78	USD	

Equiv Fare Paid Orig Curr	Curr of Equiv Fare Paid	Equiv Fare Paid Dervd ROE
0.00		

Total Tax - USD	Total Tax Orig Curr - USD	Tax Amt Dervd ROE
80.58	80.58	

Tkt Doc Amt	Tkt Doc Amt Orig Curr	Curr Of Tkt Doc Amt	Tkt Doc Amt Dervd ROE	Corp ROE	Tour Code
488.36	488.36	USD		1.00000	

FOP Type	HOT FOP Type	FOP Credit Card Type	FOP Acct	FOP Amt - USD	Orig Curr Amt	Orig Curr
EX	EX		0167348119790 1	488.36	488.36	USD
CA	CA			0.00	0.00	USD

COUPONS

Tkt	?	CPUI	Cpn	Stop	Orig	Dest	Mktg Carr	Oprg Carr	Mktg Flt Num	Oprg Flt Num	Flt Date	Bkng Class	Dprt Time	Arrv Time	Bkng Status	FBTD	Tkt Cls of Svc	Freq Flyer Num	Tour Code	Invol
0162357909852		F	1	O	DFW	IAH	UA	UA	00539	00539	1/29/2026	L	1218P	1335P	OK	LFA5AFDN/CH	Y	UA XA142138		N
		F	2	O	IAH	FLL	UA	UA	02135	02135	1/29/2026	L	1420P	1754P	OK	LFA5AFDN/CH	Y			N
		F	4	X	MIA	IAH	UA	UA	01743	01743	2/1/2026	S	115A	1316P	OK	SAA2AKDN/CH	Y			N
0162357909853		F	1	O	IAH	DFW	UA	UA	01388	01388	2/1/2026	S	1440P	160P	OK	SAA2AKDN/CH	Y	UA XA142139		N

LIFT

Tkt	Cpn	Orig	Dest	Mktg Carr	Oprg Carr	Flt Date	Mktg Flt Num	Oprg Flt Num	Dprt Time	Arrv Time	Trreg	FBTD	Seat	Cabin Cls of Svc	Src

Figure 8: January 29, 2026 – February 1, 2026 Flight Record for Rep. Gooden and his son (flight is from Dallas Fort Worth to Florida)

64. Under FEC guidance, campaign-related travel should be reported and paid for uniformly. The decision to split Rep. Gooden's airfare and lodging between personal and campaign funds suggests, at best, a lack of internal controls or an effort to fragment expenses. At worst, if the Florida travel served a mixed purpose, (*i.e.*, campaign and personal), using campaign funds for lodging indicates that the campaign may be subsidizing personal travel.

65. Again, due to Rep. Gooden and Mr. Phillips's refusal to cooperate with the review, the OCC could not verify (1) whether a campaign-related event actually occurred in Florida during these periods;(2) why the campaign covered only the lodging if such an event took place; and (3) the identity and purpose of the individuals who stayed at these hotels if the flights were unrelated. The Campaign Committee's failure to accurately report such travel-related expenses further complicated OCC's efforts to verify whether such payments were for bona fide campaign purposes.

iii. Potential Personal Use of Campaign Funds

66. The OCC also identified a few campaign expenses that may not have been for bona fide campaign purposes in 2022 and 2024.

a. Vail, Colorado (2024)

67. According to FEC records, the Campaign Committee reported a $17,160.70 payment to The Hythe, a luxury Vail resort[127] for "fundraising trip, room, food, and bev" on November 8, 2024.[128] At the time of this report, the OCC did not identify any publicly available invitations or flyers for the "fundraising trip" Rep. Gooden participated in or hosted around November 2024.[129] Again, because Rep. Gooden refused to cooperate with this review, the OCC could not verify whether these expenses were for bona fide campaign purposes.

b. New Orleans, Louisiana (2022)

68. On February 27, 2022, Rep. Gooden posted a photograph to his campaign Facebook page. The photograph features himself and his wife, Alexandra Gooden, in New Orleans, Louisiana, with a caption that reads: "Took a detour on the way to DC for my beautiful Louisiana wife. Happy Mardi Gras!":

[127] The Hythe Vail, https://www.thehythevail.com/ (last visited May 12, 2026).
[128] Lance Gooden for Congress Committee, FEC Form 3: Report of Receipts and Disbursements, at 34 (filed Mar. 7, 2025), https://docquery.fec.gov/pdf/928/202503079754076928/202503079754076928.pdf.
[129] The only other lodging expense in Vail, Colorado reported to the FEC around this period was by the "Brittany Pettersen for Colorado" campaign at the Sebastian Vail hotel for $2,250.00 on November 4, 2024. Rep. Pettersen is a Democrat who represents the 7th Congressional District of Colorado. Aside from Rep. Gooden, no other Republican Member of Congress reported lodging or any campaign/fundraiser-related expenses in Vail, Colorado around this period.

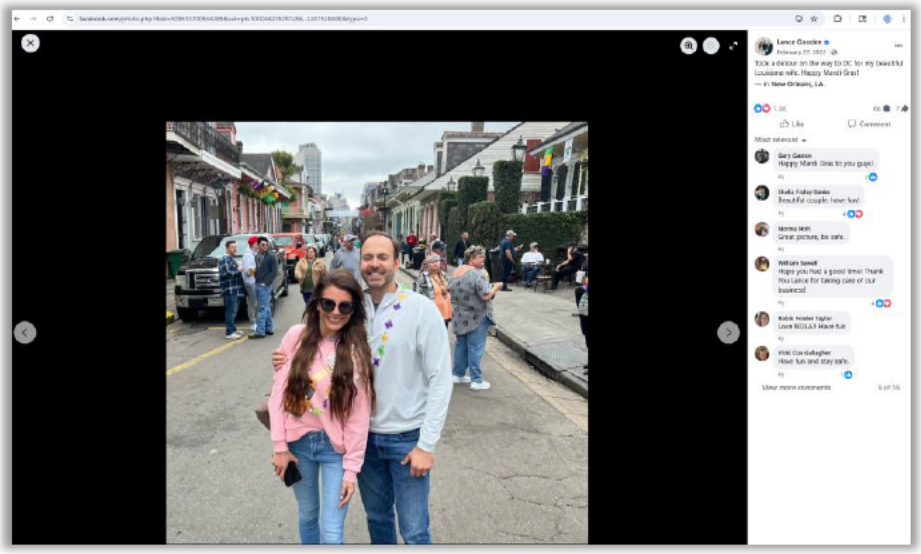


Figure 9: Screenshot of Rep. Gooden's photograph posted on his campaign Facebook[130]

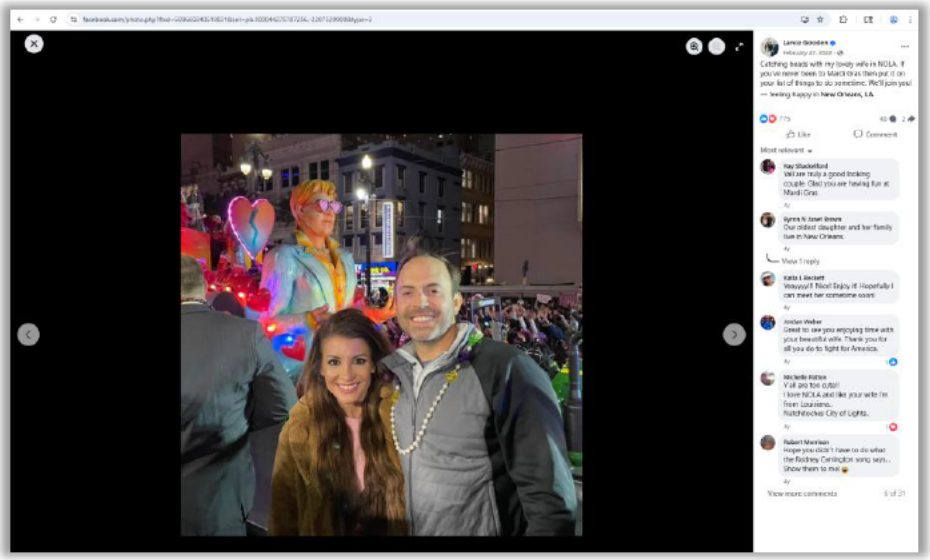


Figure 10: A second screenshot from Rep. Gooden's campaign Facebook – caption reads: "Catching beads with my lovely wife in NOLA. If you've never been to Mardi Gras then put it on your list of things to do sometime. We'll join you!"[131]

[130] Lance Gooden (@lancegoodenfortexas), *Photo with Wife in New Orleans, Louisiana,* Facebook (Feb. 27, 2022), https://www.facebook.com/photo.php?fbid=509515700534285&set=pb.100044275787256.-2207520000&type=3.

[131] Lance Gooden (@lancegoodenfortexas), *Photo with Wife in Front of Carnival in New Orleans, Louisiana*, Facebook (Feb. 27, 2022), https://www.facebook.com/photo.php?fbid=509660240519831&set=pb.100044275787256.-2207520000&type=3.

69. On February 28, 2022, the Campaign Committee reported a $1,286.20 payment to the "W New Orleans" for "event food & beverage."[132] The W New Orleans is a hotel that was rebranded to Hotel De La Poste in January 2025. [133] FEC records do not show any other travel-related expenses on or around this day, nor do they show any travel-related expenses from any other campaign committee that would suggest a larger Republican fundraiser or campaign event. Based on the Facebook photographs, it seems Rep. Gooden and his wife took a personal "detour" trip to New Orleans, and the stay was not for bona fide campaign purposes.

70. Rep. Gooden's lack of cooperation weighs heavily in the OCC's overall analysis and contributes to the Board's overall decision to believe there is substantial reason to believe that Rep. Gooden may have improperly reported campaign expenses pursuant to FEC rules, and may have used campaign funds for non-bona fide campaign purposes in violation of House rules, FEC regulations, and federal law.

IV. CONCLUSION

71. Based on the foregoing information, the Board finds that there is substantial reason to believe that Rep. Gooden may have improperly sought travel-related reimbursement under the MRA for personal, campaign, or any unofficially related duties or responsibilities, or received reimbursement for travel expenditures that were not ordinary and necessary, commensurate with the performance of his official duties.

72. Accordingly, the Board recommends that the Committee further review the above allegation that Rep. Gooden may have improperly sought travel-related reimbursement under the MRA for personal, campaign, or any unofficially related duties or responsibilities, or received reimbursement for travel expenditures that were not ordinary and necessary, commensurate with the performance of his official duties.

73. Based on the foregoing information, the Board finds that there is substantial reason to believe that Rep. Gooden may have improperly reported campaign expenses pursuant to FEC rules and may have used campaign funds for non-bona fide campaign purposes in violation of House rules, FEC regulations, and federal law.

74. Accordingly, the Board recommends that the Committee further review the above allegation that Rep. Gooden may have improperly reported campaign expenses pursuant to FEC rules and may have used campaign funds for non-bona fide campaign purposes in violation of House rules, FEC regulations, and federal law.

[132] Lance Gooden for Congress Committee, FEC Form 3: Report of Receipts and Disbursements, at 34 (Filed May 19, 2022), https://docquery.fec.gov/pdf/450/202205199512400450/202205199512400450.pdf.
[133] *W New Orleans French Quarter*, Condé Nast Traveler, https://www.cntraveler.com/hotels/united-states/new-orleans/w-new-orleans-french-quarter (last visited May 12, 2026).

V. INFORMATION THE OCC WAS UNABLE TO OBTAIN AND RECOMMENDATION FOR THE ISSUANCE OF SUBPOENAS

75. The Board notes the significance of Rep. Gooden's decision not to cooperate with the OCC's review, particularly because every individual who also declined to cooperate was either represented by his attorney, or an individual who is/was closely associated with him. This raises questions about whether all parties involved received equal and unbiased representation and casts doubt on the credibility of Rep. Gooden as the subject of this review.

76. Of note, through counsel, Rep. Gooden claimed to "remain committed to cooperating in good faith," and that if the OCC has "specific questions regarding any particular expenditure or transaction," he would "welcome the opportunity to address those directly and promptly."

77. However, despite the OCC's repeated, documented efforts to obtain information from Rep. Gooden and key third-party witnesses, including the campaign treasurer and both current and former staff, such efforts were met with consistent refusal. Rep. Gooden declined to provide documents or testimony, all while representing through counsel, without apparent basis, that he remained committed to cooperating in good faith.

78. In the matter of allegations against Rep. David Schweikert, the Committee stated that ". . . public office is a public trust, and as part of that public trust, public officials should take seriously allegations that threaten the integrity of the institution and seek to be forthright and cooperative with the body designed to review such allegations."[134]

79. In addition, the OCC received correspondence from Rep. Gooden's counsel explicitly acknowledging the OCC's outreach to third parties, including the campaign treasurer who likewise refused to cooperate with this review. The fact that Rep. Gooden shares counsel with at least two key third-party witnesses, all of whom declined cooperation, raises a reasonable inference that non-cooperation was not coincidental but coordinated. The record suggests that, at the very least, Rep. Gooden may have interfered with the OCC's review by discouraging or directing witnesses not to participate.

80. This pattern of implied obstruction materially impaired the OCC's ability to assess, verify, and substantiate Rep. Gooden's official and campaign-related spending and reimbursement practices.

81. The following witnesses, by declining to provide requested information to the OCC, did not cooperate with the OCC review:

    (1) Rep. Lance Gooden;
    (2) Matthew Esguerra;
    (3) Jackson R. Willis;
    (4) Robert Phillips III;
    (5) Edward (Ed) McCain;
    (6) Susan (Shawn) Tidwell;

[134] Comm. On Ethics, *In the Matter of Allegations Relating to Representative David Schweikert,* H. Rept. 116-465, 116th Cong., 2d Sess. 14 (2020), at 108.

(7) Jennifer Alden;
(8) Madison Malone;
(9) Micah Bock; and
(10) JP Morgan Chase Bank[135].

82. The Board recommends that the Committee on Ethics issue subpoenas to:

(1) Rep. Lance Gooden;
(2) Matthew Esguerra;
(3) Jackson R. Willis;
(4) Robert Phillips III;
(5) Edward (Ed) McCain;
(6) Susan (Shawn) Tidwell;
(7) Jennifer Alden;
(8) Madison Malone;
(9) Micah Bock; and
(10) JP Morgan Chase Bank.

[135] As previously noted, JP Morgan Chase, through counsel, engaged in a series of meetings with the OCC in attempts to cooperate with the OCC's review. Citing internal and privacy policies, JP Morgan Chase (through counsel) declined to provide requested documents though expressed an affirmative willingness to comply upon receipt of a formal subpoena from the House Ethics Committee.